

Personnel Preparation and Public Law 94-142

THE MAP, THE MISSION AND THE MANDATE

SECOND EDITION

1978



Division of Personnel Preparation
Bureau of Education for the Handicapped

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Division of Personnel Preparation
Bureau of Education for the Handicapped
U. S. Office of Education

A REPORT

Edited by
JUDY SMITH
University of New Mexico

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Preface

In the summer of 1977 and the summer of 1978, the Division of Personnel Preparation, Bureau of Education for the Handicapped, sponsored three regional conferences for directors of its funded projects. These conferences were intended to clarify concerns, directions, and priorities in the training of special education personnel on a national and regional basis.

At each meeting, the Division Director, Branch Chiefs, Project Officers, and professionals from the field acted as session leaders. Their presentations were, in turn, answered by panels of attendees who summarized the reactions and questions of the regional audiences.

This book is a distillation of the issues and directions presented at the 1977 and 1978 meetings. In an effort to consolidate topics in an orderly manner, occasional remarks by one speaker have been transferred to the chapter of a different speaker. The chapters represent major conference addresses, which converge on the implementation of Public Law 94-142 through the preparation of professionals in special education.

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CONTENTS

FOREWORD	vii
Edwin W. Martin, Deputy Commissioner of Education and Director, Bureau of Education for the Handicapped	
1 REGIONAL COLLABORATION	3
Jasper Harvey, Director, Division of Personnel Preparation, Bureau of Education for the Handicapped	
2 THE EDUCATION FOR ALL HANDICAPPED CHILDREN ACT OF 1975: PUBLIC LAW 94-142 REGULATIONS	15
Thomas Irvin, Policy Officer, Division of Assistance to States, Bureau of Education for the Handicapped	
3 COOPERATIVE MANPOWER PLANNING	21
Richard C. Schofer, Chairman, Department of Special Education University of Missouri-Columbia	
4 INSERVICE PROGRAMMING AND PRESERVICE PRIORITIES	27
James Siantz and Edward Moore, Project Officers, Division of Personnel Preparation, Bureau of Education for the Handicapped	
5 INNOVATION AND EVALUATION IN PERSONNEL PREPARATION	35
Philip J. Burke, Former Chief, Western Region and Special Projects Branch, Division of Personnel Preparation, Bureau of Education for the Handicapped	
6 DISSEMINATION	43
Gary Adamson and Judy Smith, <i>Teacher Education/Special Education</i> , University of New Mexico Dissemination Project	
7 CURRENT PROCEDURES AND ISSUES IN GRANT ADMINISTRATION	49
Herman Saettler, Chief, Western Region and Special Projects Branch, Division of Personnel Preparation, Bureau of Education for the Handicapped	
8 RESPONSES FROM THE PROFESSION	67
Joseph T. Gilmore, New York State Education Department Reuben Altman, University of Missouri-Columbia Cynthia Gilles, Massachusetts Department of Education Edward J. Kelly, University of Nevada Jasper Harris, University of Kansas George M. Olshin, Southern Connecticut State College Jerrie Ueberle, Arizona Department of Education Diane D. Bricker, University of Miami, Florida Lawrence W. Marrs, Murray State University	
9 CONCLUSION: PARTNERSHIP FOR CHANGE	79
Jasper Harvey, Director, Herman Saettler and Paul Ackerman, Branch Chiefs, Division of Personnel Preparation, Bureau of Education for the Handicapped	

AFTERWORD	85
Robert B. Herman, Associate Deputy Commissioner, Bureau of Education for the Handicapped	
REFERENCES	88

FIGURES

1 Areas served by branches of the Division of Personnel Preparation ..	8
2 OE FORM 9047, Standard Form 424 (face sheet of proposal packet) ..	61
3 OE FORM 9047 (Table 1. Preparation Program Profile)	62
4 OE FORM 9047 (Table 2. Preparation Program Staff Profile)	62
5 OE FORM 9047 (Table 3. Report of Project Graduates for Academic Year)	63
6 OE FORM 9047 (Section A. Budget Categories)	63
7 OE FORM 9047 (Section B. Budget Summary)	64

TABLES

1 Eastern Region Branch: Division of Personnel Preparation	9
2 Central Region Branch: Division of Personnel Preparation	10
3 Western Region and Special Projects Branch: Division of Personnel Preparation	11
4 Program Review Staff: Division of Personnel Preparation	12
5 Staff, Office of the Director: Division of Personnel Preparation	12
6 Projected Fiscal 1979 Funds Distribution According to Priorities, Division of Personnel Preparation	13
7 Field Rater Comments on Evaluation Plans	38
8 Field Rater Comments on Total Programs	38
9 Funding Disposition by Project Officers	39
10 Funding Disposition by Field Raters	39
11 Explanation of Program Approval Cycles and Budget Periods	59
12 State-by-State Program Cycles	60
13 Regional Civil Rights Directors	65
14 Schedule for Processing New Grant Applications, FY 78-79, Division of Personnel Preparation	83
15 Schedule for Processing Continuation Grant Applications, FY 78-79, Division of Personnel Preparation	84

**EDWIN W. MARTIN**

Deputy Commissioner of Education and Director
Bureau of Education for the Handicapped
U. S. Office of Education

FOR THOSE of us involved in special education, this may appear to be both the best of times and the worst of times: the best in terms of the many forms of support and encouragement we are experiencing; the worst in terms of the various changes and crises that occur as we struggle to make Public Law 94-142 a practical reality.

Things are going very well in the sense that the new administration has very positive attitudes toward programming for and education of the handicapped. On several occasions, I have had the opportunity of working with Secretary Califano, particularly when we were developing the regulations for Section 504 of the Rehabilitation Act, and I have found him to be all of the things you may have observed—energetic, sharp, a very quick study, and a person who has a passionate commitment to human beings and to moving programs and making them more responsive. In each instance of decision-making on whether to move forward or backward in budgeting, the Secretary has gone forward to the Office of Management and Budget and to the President, has asked for additional funds, and has been successful. With this kind of leadership, the feeling that many of us have is that we need to reawaken our sense of commitment and re-establish what we are trying to do in an agency that deals with human services.

Equally reassuring, Ernest Boyer, who was Chancellor for Higher Education in New York State before he became U. S. Commissioner of Education, also earned a doctorate and did post-doctoral work in speech and hearing at the University of Iowa. He therefore has an original commitment to working for the interests of disabled people, and has been a very interested, supportive, and knowledgeable advocate for our objectives. We are in an era in which the Commissioner can say, as he has, that one of his

major concerns is programming for the handicapped and for disadvantaged youngsters, under the basic equal education opportunity theme. For those of us who have worked hard together over the years, this represents considerable positive movement.

Another step forward has been made with Public Law 94-142, although its implementation is highly controversial, and I imagine that you can see the problems more clearly than I can from this vantage point. However, we have gone out of our way to talk with people about their feelings and concerns, both in terms of developing the regulations (which Tom Irvin, Dan Ringelheim, and many others on our staff did very sensibly and very well), and in terms of devising an operating philosophy that would enable us to be understanding of the problems that state and local administrators are having. At the same time, we have been trying to work out solutions within the framework of the law.

The Bureau of Education for the Handicapped testified, and I think correctly, that we did not want amendments to the Education of All Handicapped Children Act at this time. Some amendments, I am sure, would be meritorious; there is no bill passed by the Congress that is not amended somewhere along the line and, in many instances, improved. But it is too early to do that now. The anxiety that people feel when a new public law is passed might result in over-reaction that would, for example, delay the date when services should be available to children or weaken the protections in some other way—because these are the things that create the most anxiety. I think we are realistic enough, and the Congress is certainly realistic enough, to understand that everything will not happen in ideal circumstances, with 100-percent effectiveness, all of the time. Nevertheless, it is terribly important that we have, as the basis

of our operation, a commitment on the part of state agencies to do what is required. In the past few years, we have been moving through a period of partial commitment or partial official policy. We want to move past that posture. To do so, it is very important that we do not retreat now. In order to participate in the Education for All Handicapped Children Act, a state must say, once and for all: *this is officially our policy; we will do this*. Subsequently, as we negotiate about problems or failures, we will do so with the permanent commitment of trying to respond.

I am sure that we will find many situations that are less than perfect. You will bring them to our attention, parent groups will bring them to our attention, and other advocate groups will report them. There will be problems, things will not always work properly, and remedial actions will be necessary—and then some of the remedial actions will not be accomplished as soon or as well as they should. There will be give and take. It is our job to make sure that none of the problems, insofar as we can determine, is based on subterfuge or on an unwillingness of a government agency to do the job. As long as all of our efforts are in good faith, with a sense of responsibility for resolving problems, I think we can reconcile the issues.

There are still people who feel strongly to the contrary. Recently a representative of a national organization that administers education indicated that his group would like at least partial relief from the requirements of the law. Others would like to make their compliance contingent on the availability of more dollars. Still others would like to remove some of the specific requirements in the due process section. At least one state education agency staff read the law incorrectly and, as a result, thought they had a year more to develop individualized educational programs than they actually have, and so they have requested a waiver. These are not the sorts of changes we are going to support right now. If people are moving heaven and earth to implement the law, I believe that a good faith response will be recognized, as opposed to a response that people intend to fight until the last minute to avoid implementing these programs and requirements.

Basically, we are operating on the basis of three points:

- The Act will be implemented.
- There will be a certain amount of muddling through, which is better than the alternative of having no firm dates or clearcut tasks.

- We want to commit ourselves as a professional group to working flexibly and cooperatively to solve the problems, but we will not retreat from the principle that every youngster must be a part of an educational program.

The Bureau of Education for the Handicapped is not interested in confrontations that would lead to the discontinuation of funds; we would do that only as a last resort. We are, however, interested in the principle that children are not going to be turned away from programs; that the programs are going to make sense; and that, when a child is identified and is not in a program, school personnel can make an affirmative response that will enable parents to sit down with them and solve the problem. Within these principles, I think there can be latitude. Next year's programs may be better than this year's, or may be more intensive, or may include more supportive services. We will not move from zero to 100 percent effectiveness in one step. Thus, I want you to feel free to write to me about issues that you find are of great concern, things you feel we ought to hear. We are very much interested in continuing the process of dialogue, and we will probably have meetings over the coming year or so, at different locations in the country, to talk about the issues of implementing 94-142.

Certainly one of the larger recurring issues is the generalized attitude that these things cannot really be done effectively, that all of these children cannot be served, that children cannot be placed in least restrictive environments because teachers are ill prepared. Some of the greatest alarm has been expressed by teachers' organizations. We are trying to work with these organizations and involve them in the teacher training business to some extent, so that they may find ways to help meet the needs of teachers, rather than simply expressing cautions.

Those of you who are already in the training business are going to be under pressure to stretch your capacities to all of the situations where new training will be necessary and to solutions of local problems as they arise. For example, parents and others may challenge the services that youngsters receive, or may charge that a teaching staff is insufficiently trained. The school district may, as a consequence, become the subject of an order from the Office of Civil Rights, or from our office, to provide inservice training as an immediate response to the situation. They will turn to you for help, even though that is often the most awkward method of

entering into collaboration. I hope you, as trainers of professionals, will do everything you can to assist in such situations, using all of your resources to help programs succeed. The longer we can see that kind of cooperation, the easier it will be for us to try to keep financial resources flowing to accomplish our goals for handicapped children.

have been partly responsible for developing that strategy. However, the change to these new formats can be an awkward transition. Some arbitrary decisions have to be made, some good things are sacrificed in the name of other good things, and a certain amount of game playing goes on. We understand that, but we are not encouraging it. We would like to see every dollar spent for the activity of highest priority.

I want you to know that I am aware of the pressures that federal policies have placed upon many of you. I know for a fact that your funds are being reduced and that you are being forced to reorient your own priorities and programs in ways that will match the categories in which we now have money. It would be simpler for us, and certainly a lot simpler for you, if we could give you the money with no strings attached and let you use your own sense of priorities. I do not think your programs would be any the worse for it, in the long run, because I would trust your priorities. But the fact is that we must have a sense of targeting, a sense of priorities, a sense of accountability—if we are to convince the Congress, the Government Accounting Office, the Office of Management and Budget, and others waiting impatiently in the wings that we are putting these dollars where they should go. I support that, too, and we

I thank you for understanding these things. As a group representing training institutions, you have done many things well over the years. You were tremendously responsive in the old days when we moved out money for retardation, for speech disorders, and for other areas through different kinds of grants. You have supported the priorities as they were established, in early childhood education and in the education of the severely handicapped—even though these were a departure from the kinds of things you had been doing, even though it was not convenient. Now that we are trying to meet these new priorities, you are helping in good spirits and with good will. Because of these things, and because of the quality and dedication you have brought to the work of preparing professionals, I hope we will be working together for a long time to come.

A Postscript for 1978 . . .

As this book goes into its second edition, I want to share with you a major new initiative for the implementation of Public Law 94-142 which will affect the use of federal funds under Part B for school years 1978-79 and 1979-80. As you know, the provisions of this Act require the identification, location, evaluation, and placement of all handicapped children who reside in the state who need special education and related services. The child count submitted to BEH concerning the number of handicapped children receiving special education in 1977-78 indicates that approximately 7 percent of the school-aged population (the 5 to 17 age group) are currently enrolled in special education. This percentage may be viewed as below the expected prevalence rate of handicapping conditions within the overall student population, and reports from several states indicate that enrollment figures of 9 to 11 percent have been achieved.

Although we do not intend to impose a strict percentage requirement, we do feel that variable attendance rates among districts and states require those with lower rates to be able to document full and appropriate identification activities which assure that handicapped children enrolled in school, as well as those formerly excluded, are being identified and served. We expect Part B and discretionary funds will be used by both the state and local education agencies wherever possible to provide services to school-aged children who are not currently receiving needed special education services. The highest priority for the use of these funds should be for activities relating to identification, diagnosis, and the initiation of new programs or expansion of existing programs to meet the needs of increased numbers of handicapped children—as well as screening activities at both elementary and secondary levels to locate children who may be handicapped. We hope that, through these initiatives, we can reach every child who needs special education and related services.



Personnel Preparation and Public Law 94-142

THE MAP, THE MISSION AND THE MANDATE



Division of Personnel Preparation
Bureau of Education for the Handicapped

REGIONAL COLLABORATION



JASPER HARVEY

Director
Division of Personnel Preparation
Bureau of Education for the Handicapped

THE DIVISION of Personnel Preparation has pledged to see that the mandates of Public Law 94-142 are accomplished—and accomplished well. We want to carry out that promise through you, professional trainers who represent various areas of the United States, by means of the major effort in personnel preparation that is necessary to implement the law.

Toward that end, we have convened regional meetings of project directors funded by this Division. One of our purposes in these meetings has been to clarify the kinds of proposal writing and responding to priorities that will be important to you now and in the future. A second purpose has been to bring attention to some of the problems the entire country faces in terms of the requirements that must be met. A third purpose is to focus on essential tasks that will help to create the solutions we seek. An additional objective is to introduce and explain to you the reorganization of this Division into branches that represent three geographical regions of the nation (Figure 1), and the creation of a Program Review Staff intended to provide technical support to our branches and to you who offer proposals.

The Division and its staff will remain in the same location in Washington, D.C., and the functions of grant administration will remain essentially the same. In serving groups of contiguous states, however, branches and individual project officers are gaining the ability to assist regions, rather than isolated states or projects, in developing substantive programs for the continuing supply of well trained personnel. We are also working in liaison with the Division of Assistance to States so that correlation may be achieved between training as addressed in state plans and as addressed in personnel preparation grants. As a result of these shifts, we as a Division have greater capacities to fund programs that complement one another in the development of regional training bases, and we will also gain greater insights into the quality and long-term collaborative efforts that should be a fundamental part of our efforts.

The Eastern Region Branch (Table 1) administers funding to programs in the District of Columbia, Puerto Rico, the Virgin Islands, and sixteen states: Connecticut, Delaware, Indiana, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, and West Virginia. These states do not, of course, comprise the entire east coast, and, compared with other geographical areas, they represent less than one-fourth of our total land mass. However, this particular area includes a group of very heavily populated states, whose programs have

We want to support complementary programs and develop greater insights into quality and long-term collaborative planning.

Regional branches have been established for planning and problem-solving specific to geographical areas.

traditionally been able to stand alone and attract large numbers of students, thus tending to fill personnel requirements in their immediate areas. These states also contain several of our larger and almost interlocking metropolitan areas, with their particular needs and difficulties. Moreover, although this region covers a relatively small area, we are currently committing to it about one-third of our program assistance grants.

The Central Region Branch (Table 2), on the other hand, covers a territory much larger than that of the eastern region but serves fifteen states: Alabama, Arkansas, Florida, Georgia, Illinois, Iowa, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, North Carolina, South Carolina, Tennessee, and Wisconsin. This area contains fewer of the tremendous population centers per square mile and also covers large expanses of rural land. Thus, its goals and concerns would appear different from those of New York and New Jersey, for example.

When we come to the Western Region and Special Projects Branch (Table 3), we find an immense geographical terrain that includes American Samoa, Guam, the Trust Territories, and nineteen states: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Kansas, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, and Wyoming. Much of this region is sparsely populated, and many of its communities are small and remote. Therefore, manpower needs here are dramatically different from those of other states. (This branch also administers Special Project grants, which are discussed in chapter 5.)

From a very practical viewpoint, we had to divide our workload equitably among our project officers, and this is another thing that the reorganization has accomplished. Our people need opportunities to do their best professional work, and some changes were in order so that such opportunities could be multiplied, even though we are seriously understaffed. For example, in 1970 the Division of Personnel Preparation administered \$17.5 million, while in 1978 we are administering over \$55 million—with fewer staff members than we had seven years ago.

Another step we have taken to equalize the burden and to ensure our project officers more time and increasing avenues to act in their professional capacities is the establishment of the Program Review Staff (Table 4), composed of technical specialists who formerly functioned throughout the Division. This group will carry out overviews and assessments of proposals as they are received, from a technical rather than a programmatic viewpoint, so that our staff may be assured of the intactness of each proposal prior to review by project officers and field readers. Over time, this staff will also carry out a number of data-gathering functions that will provide timely information to the Division, to you, to the Congress, and to our other constituencies. (The staff of the Office of the Director, shown on Table 5, completes the personnel roster.)

Our own internal operation was not the only reason, nor was it the primary reason, for the Division's reorganization. The most basic factor behind this change is the growing need to plan and work together to attend to regional problems that arise in implementing Public Law 94-142, and to address national priorities judiciously as they translate to a regional basis. Such planning is necessary in order to put our limited resources to their most effective use in meeting regional and national needs.

*One by-product of
technical review will be
data-gathering.*

We cannot afford to disburse the kind of money that would allow parallel programs to be set up in each state. For fiscal year 1979, we will be disbursing \$55,375,000, which includes a new \$10 million for inservice only. This is little more than we had for fiscal 1976 and fiscal 1977. When an 8 percent inflation factor is added, we are clearly administering little more in each succeeding year.

Our funding is based on twelve priority areas (Table 6). These are national priority areas for personnel preparation that were included in the President's budget and authorized by the Congress. Excerpts from both the House and Senate Reports concerning training personnel for education of the handicapped indicate the need to target training within established priorities. The following statement is included on pages 7 and 8 of Senate Report No. 95-124, of March 6, 1977:

The committee anticipates that as the states intensify their efforts to meet the full service mandate in Public Law 94-142 there will be a critical need for additional special education personnel trained to provide educational services to severely and profoundly retarded children, children with low prevalence handicapping conditions, such as the blind and visually handicapped, the deaf and hearing impaired, the deaf-blind, and children with severe and multiple impairments. During its hearings on S. 725, the subcommittee heard testimony which indicated present and future personnel shortages in these areas. The Bureau of Education for the Handicapped can alleviate this shortage by targeting resources to these areas.

It also has been brought to the committee's attention that the arts can be used effectively as a teaching tool for handicapped children. Not only can handicapped children be taught special skills, but also previously unresponsive handicapped children may react favorably to an arts program, which in turn will open the door to additional learning experiences. For this reason, the committee feels that increased attention should be given to training personnel in arts activities.

House Report No. 95-269 makes essentially the same statement and adds, on page 9, that:

The committee also recognizes that Public Law 94-142 has created additional demands on school personnel throughout the country and there is an increased need for understanding and training in order to fully implement the new law. The committee expects that the Bureau of Education for the Handicapped will assist state and local education agencies to the maximum extent possible in providing inservice training to help facilitate this implementation.

Among the priorities in personnel preparation, each region has its own greatest needs which must be filled by a concerted effort within the region. This cannot be done on a state-by-state basis, nor can it be done by funding core programs and providing financial cushions to large state universities. We cannot keep that kind of money coming. This is a discretionary grant program, not a formula-based operation. We are dealing with thrust-relevant proposals on a discretionary basis, and the monies are *highly competitive*.

The monies will, in fact, be allocated on the basis of broad-based, comprehensive regional programming that will clearly make Public Law 94-142 a practical reality across the nation. The mission statement of this Division reflects

Funds are directed toward highly competitive, thrust-relevant proposals.

The mission of the Division of Personnel Preparation has several implications.

just how serious we are in this regard:

The thrust of the Division of Personnel Preparation is to provide professional, technical, and financial assistance to various institutions for the purpose of preparing qualified educators and other appropriate personnel in sufficient numbers in order to assure that the purpose of Public Law 94-142—that all handicapped children have available to them a free, appropriate public education in the least restrictive environment, which emphasizes special education and related services designed to meet their unique needs—may be implemented. The Division of Personnel Preparation reviews thrust-relevant proposals and administers grants awarded to institutions of higher education, state education agencies, local education agencies, and other nonprofit agencies on the basis of applications judged to merit funding by panels of competent professionals.¹

That statement holds a number of implications. We are extremely concerned with the training of personnel to deal with the severely impaired. Although this is a low-incidence population, it is also an extremely difficult group in terms of teaching. As of today, there are only a handful of training programs that are truly focusing on severely and profoundly handicapped youngsters. Also seriously lacking until this year have been programs to prepare graduate students to work with the visually handicapped, and we are now faced with a pressing need to support doctoral programs in the area of the hearing impaired. Moreover, there is a distressing lack of activity in preparing personnel to serve autistic and other severely disturbed pupils. Nor are we doing, ethically and morally, what we should do for the Native American child who is handicapped, and this has been a specific Congressional question when the Commissioner and Deputy Commissioner have appeared before the Senate and House Appropriations Committees. A further concern has been the inattention in grant applications to the needs of bilingual populations across the nation. We must work together to provide personnel to serve all of these children—uniformly, and in even the most remote areas.

Considering our budget, we must also be most concerned with quality and cost-effectiveness, as evidenced by program evaluation data that prove that our programs work and thus merit funding. Moreover, to work regionally, to pool our resources, to develop complementary programs, we must be involved in manpower planning and in dissemination and replication. We further need to create effective inservice training programs for general and special educators so that they will be able to do the jobs that lie ahead of them in their classrooms and communities. Finally, every time we talk about special education, we talk about related services—professionals from other disciplines, as well as paraprofessionals, volunteers, and parents. These are crucial groups of people for whom we should provide substantial training.

Our regional meetings, and the remainder of this book, have been planned to clarify not only the process of grant awards, but also to introduce some guidelines for the tasks to which we must all address ourselves. These guidelines come not only from the Division of Personnel Preparation, but also from groups of professionals from the field whom we have invited to advise us during the past two and a half years and from those who attended the regional meetings.

The areas we are now organized to serve are, in a sense, states on the map—but “a map is not a territory.”² In a greater sense, then, these areas are individually defined territories with their own lists of priorities and their unique ideas and problems. As a Division, we wish to use our budget for the incorporation of these factors in regional planning. As professionals, we look to this kind of planning as the best possible way to achieve our national goals.

A map is not a territory.

¹ Bureau of Education for the Handicapped. Planning document (unpublished draft), 1977.

² Hayakawa, S. I. Language in thought and action. New York: Harcourt, Brace, and World, Inc., 1964.

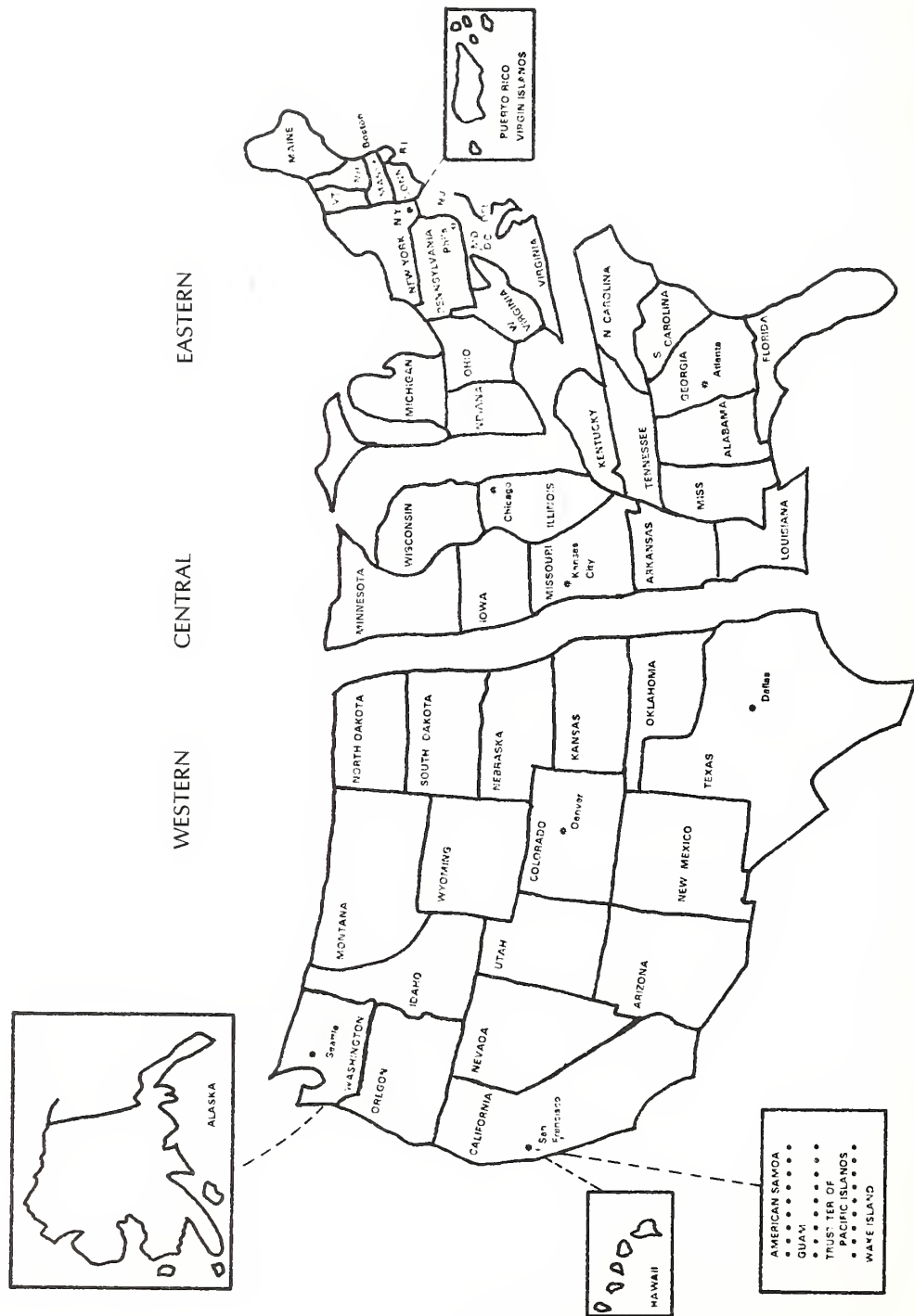


Figure 1. Areas served by branches of the Division of Personnel Preparation.

TABLE 1
 Eastern Region Branch
 Division of Personnel Preparation

<i>Personnel</i>	<i>Assigned States</i>	<i>Assigned Program Areas</i>
THOMAS BEHRENS Branch Chief (202) 245-9736	Delaware Michigan New York Puerto Rico Virgin Islands West Virginia	Deaf/Hard of Hearing Regular Education Preservice Severely Handicapped Learning Disabilities Caribbean Area
MARYANN McDERMOTT Project Officer (202) 245-9431	Indiana Pennsylvania Virginia	Interpreters for the Deaf
Project Officer To be assigned	Dist of Columbia Maryland Ohio	
JOSEPHINE TAYLOR Project Officer (202) 245-9736	Connecticut Maine Massachusetts New Hampshire New Jersey Rhode Island Vermont	Visually Handicapped Multihandicapped Preschool Severely Handicapped
VICTORIA WARE Education Technician (202) 245-9736		
FRANCINE LUCKEY Clerk-Typist (202) 245-9736		
STEPHANIE SMITH Clerk-Dictaphone Transcriber (202) 245-9736		
ANMARIE KALLAS ALLEVA Education Program Specialist (202) 245-9431		

TABLE 2
Central Region Branch
Division of Personnel Preparation

<i>Personnel</i>	<i>Assigned States</i>	<i>Assigned Program Areas</i>
PAUL ACKERMAN Branch Chief (202) 245-9549	Illinois Minnesota Wisconsin	Native Americans Research Needs in Training Music Education/Therapy for the Handicapped Training Model Replication Early Childhood
BETTY BAKER Project Officer (202) 245-9549	Arkansas Louisiana Mississippi Tennessee	
SARA CONLON Project Officer (202) 245-9431	Alabama Florida Georgia South Carolina	Senior Advocate for Speech and Hearing Severely Handicapped State Education Agencies
WILLIAM HILLMAN Project Officer (202) 245-9431	Iowa Kentucky Missouri North Carolina	Physical Education Recreation Arts for the Handicapped
ROSE SAYER Staff Secretary (202) 245-9549		

TABLE 3
Western Region and Special Projects Branch
Division of Personnel Preparation

<i>Personnel</i>	<i>Assigned States</i>	<i>Assigned Program Areas</i>
HERMAN SAETTLER Branch Chief (202) 245-9431	Alaska	Special Projects Special Education Administration Severely Handicapped Mental Retardation
MARTHA B. BOKEE Project Officer (202) 245-2326	Idaho Montana Nebraska North Dakota South Dakota Wyoming	Career/Vocational Education
GWENETH BLACKLOCK BROWN Project Officer (202) 245-9431	American Samoa Arizona California Guam Hawaii Trust Territories	Emotionally Disturbed Volunteers (including Parents) Pacific Territories
EDWARD MOORE Project Officer (202) 245-9736	Kansas Oklahoma Oregon Washington	Regular Education Inservice Paraprofessionals Minority Concerns
WILLIAM PETERSON Project Officer (202) 245-9736	Colorado New Mexico Utah	Special Projects School Finance School Law
JAMES SIANTZ Project Officer (202) 245-2326	Nevada Texas	Regular Education Inservice Interdisciplinary Training University Affiliated Facilities
BETTY MASON Administrative Support Assistant (Typing) (202) 245-9431		Branch Secretary To be assigned

TABLE 4
Program Review Staff
Division of Personnel Preparation

CATHERINE DeLUCA
Acting Chief, Program
Review Staff
(202) 245-9431

LINDA KINNEY
Education
Technician
(202) 245-9736

AGATHA ADAMS
Administrative Support
Assistant (Typing)
(202) 245-9736

LAVERNE CHAMBERS
Administrative Support
Assistant (Typing)
(202) 245-9736

MARTINI WRIGHT
Clerk-Typist
(202) 245-9431

TABLE 5
Staff, Office of the Director
Division of Personnel Preparation

DOROTHY JACKMAN
Administrative
Support Assistant
(202) 245-9886

DORETHA JACKSON
Clerk-Typist
(202) 245-9886

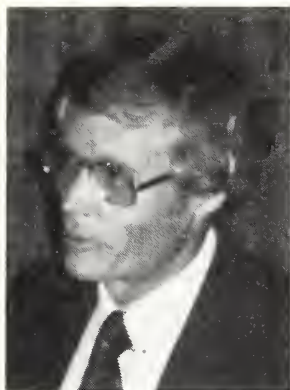
TABLE 6
Projected Fiscal 1979 Funds Distribution According to Priorities
Division of Personnel Preparation

	Preservice Amount	Numbers Trained*	Inservice Amount	Numbers Trained*	Total Amount	Numbers Trained*
<i>Preparation of Special Educators</i>						
Early childhood	\$ 3,698,000	1,155	\$ 2,465,000	6,117	\$ 6,163,000	7,272
Severely handicapped	5,024,000	1,571	2,951,000	7,787	7,975,000	9,358
General special education	4,496,000	1,363	2,754,000	7,227	7,250,000	8,590
Subtotal	\$13,218,000	4,089	\$ 8,170,000	21,131	\$21,388,000	25,220
<i>Preparation of Support Personnel for Regular and Special Education</i>						
Paraprofessional	\$ 1,051,000	744	\$ 762,000	1,799	\$ 1,813,000	2,543
Physical education	957,000	299	493,000	1,109	1,450,000	1,408
Recreation	728,000	227	359,000	886	1,087,000	1,113
Interdisciplinary	971,000	303	479,000	1,076	1,450,000	1,379
Vocational/career education	1,523,000	475	652,000	1,662	2,175,000	2,137
Volunteer program	434,000	292	653,000	1,661	1,087,000	1,953
Subtotal	\$ 5,664,000	2,340	\$ 3,398,000	8,193	\$ 9,062,000	10,533
<i>Special Education Training for Regular Education Teachers**</i>						
Subtotal	\$ 7,250,000	—	\$11,875,000	46,929	\$19,125,000	46,929
<i>Instructional Models</i>						
Developmental assistance	—	—	\$ 725,000	1,782	\$ 725,000	1,782
Model implementation	2,385,000	745	2,690,000	6,780	5,075,000	7,525
Subtotal	\$ 2,385,000	745	\$ 3,415,000	8,562	\$ 5,800,000	9,307
TOTAL	\$28,517,000	7,174	\$26,858,000	84,815	\$55,375,000	91,989

* Estimated to receive financial support from this source.

** Direct financial assistance related to preservice training of regular classroom teachers is not provided. (Preservice is for Deans' Grants.)





THE EDUCATION FOR ALL HANDICAPPED CHILDREN ACT OF 1975: PUBLIC LAW 94-142 REGULATIONS

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SINCE ITS enactment on November 19, 1975, Public Law 94-142 has received tremendous attention—both positive and negative—from all quarters of the educational community. Whatever one may feel about the law, it is clear that its provisions will have a far-reaching effect on every handicapped child in the nation; on all state and local education agencies and other public agencies and institutions involved in the education of handicapped children; and on nearly 800 institutions of higher education that are engaged in training special education personnel.

The law is not discrete unto itself but, rather, provides extensive amendments to Part B of the Education of the Handicapped Act. (Part B is a formula grant program that provides financial aid to state and local education agencies to assist them in the education of handicapped children.) In spite of the attention it has received, most of the provisions in the law are not new. Such requirements as due process, child find, least restrictive environment, non-discriminatory testing, and others, were first passed under Public Law 93-380 (The Education Amendments of 1974) and subsequently incorporated into Public Law 94-142. In some cases, the provisions were incorporated verbatim; in others, they were greatly expanded.

Before the proposed regulations were drafted, the Bureau of Education for the Handicapped carried out a massive effort to obtain comments and suggestions for their development from interested parties throughout the United States. In this effort, Bureau personnel met with nearly 2200 people and received several hundred written comments and recommendations. Next, a 170-member writing team (composed of parents, advocates, and representatives of educational agencies and special interest groups) was convened to prepare concept papers on major topics in the law. These papers formed the basis of the proposed rules, which were published on December 30, 1976.

During the 60-day public comment period that followed publication of the proposed regulations, the Bureau conducted six public hearings involving nearly 1000 people, and received over 1600 letters. A very large number of comments dealt not with the regulations themselves, but with statutory issues (problems in meeting the timelines for free appropriate public education, concerns about federal priorities that are not consistent with state and local priorities, and similar issues). A second large body of responses centered on specific issues related to the content of the proposed rules. Because so many comments were received, a number of individual concerns were consolidated,

Public Law 94-142 is not discrete unto itself but, rather, provides extensive amendments to Part B of the Education of the Handicapped Act.

The Bureau of Education for the Handicapped carried out a massive effort to obtain comments and suggestions for the development of the regulations for Public Law 94-142.

and a substantial number of changes were made on the basis of these comments and concerns. Few of these changes, however, resulted in the addition of major substantive requirements. Most of the changes were technical or were made in order to provide greater clarity or to add explanatory detail. The remainder of this chapter will present an overview of the regulations in final form, as published on August 23, 1977.³ (Subparts relating most closely to personnel preparations will be presented in greater depth than will other subparts.)

*Subpart A. General
Introduction*

Subpart A: General. Subpart A includes definitions of statutory terms (e.g., free appropriate public education, special education, related services) and other terms used throughout the regulations. Hundreds of comments pertained to the definitions, particularly those concerned with the various handicapping conditions listed in the law. Where appropriate, recommended changes were incorporated, and other revisions were made to clarify the definitions. Moreover, definitions of deaf-blind and multi-handicapped were added to the general description of handicapped children.

*The regulations define
services to be provided,
not providers of services.*

The definition of related services was expanded to include school health services, and revisions were made in the definitions of individual terms pertaining to related services (e.g., psychological services, occupational therapy, and so on) in answer to recommendations by professional associations. Following the definition of related services, a comment was added to make clear (a) that the list of related services is not exhaustive, (b) that all services may not be required by every handicapped child, and (c) that the regulations define services to be provided, not service providers.

Subpart A also sets forth the purpose and applicability of the regulations. These requirements apply to each state that receives a Part B grant and to every public agency in the state that is involved in the education of handicapped children.

*Public Law 94-142 is linked
closely with Section 504 of
the Rehabilitation Act of
1973.*

Although Part B, as amended by Public Law 94-142, is not a civil rights act, many of its provisions are regarded as basic rights of handicapped children (for example, the right to be educated, the right to due process) that have been reiterated in a series of court rulings over the past five years. Moreover, Part B is closely linked with Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112). Section 504 is a civil rights law which provides that:

No otherwise qualified individual . . . shall solely by reason of his handicap be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.⁴

Section 504 will be administered by the Office for Civil Rights in the same general manner as is Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. Thus, if any public education agency is not in compliance with Section 504, that agency could jeopardize all federal funds it receives for education (for example, Title I of the Elementary and Secondary Education Act, Vocational Education, and funds specifically earmarked for the handicapped).

*Subpart B. State Plans and
Local Applications*

Subpart B: State Annual Program Plans and Local Applications. This subpart deals with the mechanics of making Part B grants available to state and local education agencies. Each state must submit an annual program plan to the Commissioner of Education, and each local education agency must submit an annual application to the state. Subpart B also includes the requirements for

participation by the Bureau of Indian Affairs and the general requirements relating to public participation by each agency eligible to receive a Part B grant.

Subpart C: Services. Regulations governing the major service components required under Part B are contained in this subpart. These include free appropriate public education, full educational opportunity goal, priorities in the use of Part B funds, individualized educational programs, direct services by state education agencies, and the state comprehensive system of personnel development.

1. *Free appropriate public education.* The regulations include the statutory requirement that a free appropriate public education must be made available to all handicapped children aged 3 through 18 by September 1, 1978, and to all handicapped children aged 3 through 21 by September 1, 1980. The provision does not apply to handicapped children aged 3–5 and 18–21 if it conflicts with state law, state practice, or the order of any court. Thus, in effect, each state must serve handicapped children within its mandated age range, but the bottom line for every state is age 6 through 17. Handicapped children in the 3–5 and 18–21 age ranges must be served to the same extent that nonhandicapped children of these ages are served.

In addition, the PL 94-142 regulations incorporate two basic requirements from the section 504 regulations.

If placement in a public or private residential program is necessary to provide special education and related services to a handicapped child, the program, including non-medical care and room and board, must be at no cost to the parents of the child.⁵

Nothing in these regulations . . . relieves an insurer or similar third party from an otherwise valid obligation to provide or pay for services provided to a handicapped child.⁶

The Part B regulations also require physical education to be made available to every handicapped child who is receiving a free appropriate public education. The child must participate in the regular program of physical education or in a specially designed program.

2. *Priorities.* The regulations include the statutory requirement that state and local education agencies establish priorities in the use of Part B funds, first with respect to handicapped children who are not receiving an education, and second with respect to handicapped children within each disability area who have the most severe handicaps and who are receiving an inadequate education. With the exception of state administration funds, each state and local education agency must use all of its Part B entitlement in accordance with these priorities.

The final regulations were responsive to a unanimous concern regarding inservice training, which was raised by advocates, agencies, and teacher trainers. That concern focused on a potential "Catch-22" situation in which an agency is required to provide a free appropriate public education to a first-priority child and *then* provide inservice training to the child's teacher. To ameliorate this concern, the final regulations state, in effect, that the Part B funds may be used for inservice training concurrently with placing a first-priority child in school. However, the provision of inservice training may not be used as a precondition for service to children.

Subpart C. Services

The provision for a free appropriate public education means that each state must serve handicapped children within its mandated age range, and that the bottom line for every state is age 6 through 17.

First-priority children are those who are not receiving an education; second-priority children are those with the most severe handicaps who are not receiving an adequate education.

The individualized educational program is the key provision of the law and of the regulations.

3. *Individualized educational program (IEP).* This is the key provision in the law and regulations. The IEP is defined as a written statement for a handicapped child, developed in a meeting that includes a representative of the agency, the parent, the teacher and, where appropriate, the child. This written statement includes five basic components: (a) present level of educational performance, (b) annual goals and short-term objectives, (c) specific educational services to be provided to the child and the extent to which the child can participate in regular education, (d) starting date and duration of services, and (e) evaluative criteria and procedures for determining whether the objectives have been achieved.

More comments were received on IEP requirements than on any other part of the proposed rules. The two areas that received greatest attention or have been most misinterpreted are concerned with participants in IEP meetings and the content of the IEP.

The attendance of a large group at an IEP meeting can be unproductive and very costly, and could essentially defeat the purpose of securing active, open parent involvement.

A number of comments suggested that *participants in IEP meetings* should include all direct service personnel who work with the handicapped child. Other comments recommended decreasing the number of participants. In some instances, agencies have included as many as 15 school staff members in an IEP meeting with the parent of one handicapped child. The final regulations require only the participants listed in the statute. Generally, attendance of a large group at an IEP meeting can be unproductive and quite costly, and could essentially defeat the purpose of ensuring active, open parent involvement. Although all personnel working with a particular child should be informed about the child's IEP and involved in its implementation, this does not mean that they must attend the IEP meeting. Instead, they can be involved and informed through regular administrative procedures. (For example, the resource room teacher of a blind child communicates with and provides assistance to the child's regular teachers.)

While very large IEP meetings might often be inappropriate, there may be instances when additional participants are essential. Therefore, the final regulations retain a provision from the proposed rules that authorize the attendance of other participants at the discretion of the agency or the parents.

Regarding the *content of the individualized educational program*, the proposed rules (1) provided that each child's IEP include a statement of specific educational services needed by the child (determined without regard to the availability of those services) and (2) contained extensive details that went beyond the wording of the statute. There were few, if any, letters received during the public comment period that specifically supported the inclusion of these additional details. In fact, many people expressed concerns about over-regulation and found these requirements unnecessarily burdensome. On the basis of these inputs, the Bureau elected to delete the additional details included in the proposed rules and to adopt the statutory language on the IEP content essentially verbatim (i.e., a statement of specific special education and related services to be provided to the child).

Some parties have interpreted the final regulations to mean that a public agency must provide to a handicapped child only those services that are available to the agency. This interpretation is not correct.

As a result of this change, some parties have interpreted the final regulations to mean that a public agency must provide to a handicapped child only those services that are available to the agency. This interpretation is not correct. On November 17, 1977, the Bureau of Education for the Handicapped sent to Chief State School Officers an informal letter clarifying its position on the content of the individualized educational program. This letter included the following statement:

Although the wording on IEP content was changed in the final regulations, our position on the critical issues of need and required services for individual handicapped children has not been altered. We do not wish to change this basic position and, under the statute and extensive legislative history, we have no authority to do so.⁷

Subpart D: Private Schools. Subpart D sets out the requirements relating to two distinct categories of handicapped children in private schools: (a) children placed in or referred to private schools or facilities by a public agency in order to provide them with special education and related services and (b) children enrolled in private or parochial schools by their parents, but not placed there by a public agency to receive special education.

Subpart E: Procedural Safeguards. Subpart E implements the procedural safeguards set forth in the Act, including due process procedures for parents and children, protection in evaluation procedures, least restrictive environment, confidentiality of information, and procedures of the U. S. Office of Education.

1. *Due process procedures for parents and children.* Section 615 of the statute, which deals with due process procedures, is so detailed and specific that this entire section was incorporated essentially verbatim into the final regulations. Provisions range from prior written notice in all matters concerning identification, evaluation, and educational placement of a handicapped child to detailed hearing rights, state education agency appeal procedures, and civil action.

Some further provisions, added by the regulations, include: (a) parent consent for preplacement evaluation and initial placement, (b) mediation (an added comment encourages, but does not require, the use of mediation as an intervening step prior to conducting an informal due process hearing), and (c) specific timelines for hearings and appeals.

2. *Protection in evaluation procedures.* Subpart E also includes the statutory requirements on nondiscriminatory testing. Since these provisions apply to evaluation of all handicapped children, the more general term, "protection in evaluation procedures," has been substituted. Criteria and procedures are essentially the same as those in the Section 504 regulations. In effect, these provisions are designed to ensure that evaluations will be multi-factored and multi-sourced; that they will be conducted by qualified personnel; and that placement decisions will be made by a group of persons and not by an individual.

3. *Least restrictive environment.* The provision on least restrictive environment states that procedures must be established to ensure that, to the maximum extent appropriate, handicapped children are educated with children who are not handicapped. This topic received a surprising amount of attention during the public comment period. Many commenters were concerned about the possibility of overzealous implementation of this provision without regard to the needs of either handicapped or non-handicapped children. The Bureau response was the same in both the proposed and final rules. A process approach is recommended which provides that each handicapped child's placement must be determined individually and annually, and that the vehicle for making that determination is the child's individualized educational program.

In answer to concerns about disruptive or potentially dangerous students,

Subpart D. Private Schools

Subpart E. Procedural Safeguards

Due process provisions include the identification, evaluation, and educational placement of a handicapped child; detailed hearing rights; state education agency appeal procedures; and civil action.

Evaluations will be multi-factored and multi-sourced and will be conducted by qualified personnel, and placement decisions will be made by a group, not by an individual.

Placement must be determined individually and annually, and the vehicle for making that determination is the child's individualized educational program.

the Bureau incorporated the following statement from the analysis of the Section 504 regulations:

... it should be stressed that, where a handicapped child is so disruptive in a regular classroom that the education of other students is significantly impaired, the needs of the handicapped child cannot be met in that environment. Therefore, regular placement would not be appropriate to his or her needs.⁸

*Subpart F. State
Administration*

Subpart F: State Administration. Three major areas are delineated in this subpart: (a) state education agency responsibilities, including general administrative and supervisory responsibilities required by Section 612(6) of the Act, monitoring and evaluation requirements, and complaint procedures, (b) use of funds for state administration, and (c) state advisory panel.

*Subpart G. Allocations of
Funds; Reports*

Subpart G: Allocations of Funds; Reports. Included here are the statutory formulas for making funds available to state and local education agencies, as well as the procedures for counting the number of handicapped children receiving special education and related services. The allocation of funds to states is based on the annual child count.

Incentive Grants

Incentive Grants. The final regulations contain a separate part on incentive grants, which is authorized by Section 619 of the Act. This part sets forth the conditions under which states may receive grants to assist in the education of handicapped children aged 3 through 5. Congress established the incentive grants provision in recognition that, when education begins at the early stages of development, (a) benefits are maximized, (b) additional or more severe handicaps may be prevented, and (c) greater long-term cost effectiveness is realized. The incentive grants provision is a separate funding authority from the regular Part B program, and any state which serves handicapped children in the 3-5 age group and which submits an application is eligible to receive a grant under this provision.

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The publication of the final regulations under Part B, as amended by Public Law 94-142, is a major accomplishment, and people have been generally pleased with the product. In a regulation package of this magnitude, it is quite possible for specific provisions to be misinterpreted or misunderstood. We in the Bureau of Education for the Handicapped hope that you will read the regulations very carefully, and if you are not sure about a particular provision, please call us.

We see the issuance of the "final" regulations not as an end, but as the real beginning of a long and continuous effort to develop, interpret, and disseminate policies relating to the implementation of this very significant law affecting the education of all handicapped children. We look forward to working with you in this endeavor.

³ Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II.

⁴ Public Law 93-312, Rehabilitation Act of 1973, Section 504, Title V.

⁵ Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), August 23, 1977, Part II, Section 121a.302 (page 42488).

⁶ Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II, Section 121a.201(b) (page 42488).

⁷ Bureau of Education for the Handicapped. Division of Assistance to States Bulletin #5 (Informal letter to Chief State School Officers), November 17, 1977. (Copies may be requested from the Bureau of Education for the Handicapped.)

⁸ Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II, comment on Section 121a.552 (page 42497).

COOPERATIVE MANPOWER PLANNING



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IN THE past twenty years, college and university training programs in special education have undergone a remarkable expansion, which has been fundamental in relieving personnel shortages that existed across the nation. Now, however, many of these shortages no longer exist and, in fact, surplus manpower is available in certain teaching areas, while training programs appear to be unnecessarily duplicated in some parts of the country. At the same time, the thrusts of Public Law 94-142 have created new personnel requirements that are not being sufficiently answered. To reconcile these surpluses and shortages in the supply of professionals, a concerted manpower planning effort is necessary.⁹

To reconcile shortages and surpluses in the supply of professionals, a concerted manpower planning effort is necessary.

In the late spring of 1974, the Division of Personnel Preparation of the Bureau of Education for the Handicapped set up meetings in a number of states to discuss the need for cooperative manpower planning. Attendees at these meetings were essentially representatives of training programs receiving Part D funds, state education agency representatives, and Bureau staff members. For their deliberation, they received a document known as the BEH directive on cooperative manpower planning,¹⁰ which spelled out Bureau thinking about manpower problems and their solutions. In essence, it appears that the Division of Personnel Preparation was saying:

You know what your personnel needs are better than we do. You also know what your overall training resources are better than we do. In view of that, why don't you people, within each of the states, get together yourselves—training personnel, state and local education agency consumers, maybe parents and others who are concerned—and develop your own manpower planning system? Then when we look at your Part D training proposals, we can see not only how your proposals address themselves to national priorities, but also to individual state needs.

Over the past three years, this recommendation has been recognized nationally, and today all of the states are expected to be involved in the development of a statewide cooperative manpower plan. Moreover, to meet the compliance procedures of Public Law 94-142, and to make possible the expected national program expansion, the Bureau of Education for the Handicapped is now, more than ever, encouraging the development of cooperative manpower planning programs.¹¹

The University of Missouri's special project provides technical assistance to help states develop programs of cooperative manpower planning.

We provide this kind of long-term collaboration only at states' requests, and we work with them to develop, plan, structure, implement, and evaluate their programs for manpower planning.

The status of cooperative manpower planning in 1976

Extent of manpower planning

The University of Missouri at Columbia is operating a special project that is intended to help states and regions achieve such programs. This project provides technical assistance to each of the 50 states and 6 territories, in terms of technologies and strategies that have been found to be effective in manpower planning. When we provide this assistance, however, we do not suggest that we have all the answers, nor even 50 percent of the answers. Our focus is on the sharing of information, the exchange of ideas that seem to be effective (or not effective) in various states. In addition, we are engaged in some specific activities that will hopefully promote this kind of exchange. For example, we publish a newsletter and have produced several books concerned with manpower planning.^{12,13,14,15} We have sponsored symposia and operate continuing regional workshops that are announced in the newsletter. In addition, over the past 15 months, we have visited and worked with cooperative manpower planning committees and task forces in 31 different states. We provide this kind of long-term collaboration only at states' requests, and we work with them to develop, plan, structure, implement, and evaluate their programs for manpower planning. More specifically, these tasks include:

- Clarifying the Bureau's manpower planning directive.
- Determining the state's current situation in terms of the number and types of children to be served, the service needs and existing resources, current training resources, and needed personnel in critical areas.
- Delineating the purposes and functions of cooperative manpower planning committees.
- Identifying types of data to be collected.
- Planning for uses of data.
- Determining representation on committees.
- Reviewing force-field analysis techniques.
- Planning resource development alternatives.
- Developing a staffing plan and time line format.
- Proposing budget formats.
- Introducing program component alternatives.
- Designing a dissemination plan.
- Working on problem analysis and clarification.
- Defining the functions of group process specialists.
- Defining organizational alternatives.
- Developing work plans.

Notwithstanding the considerable emphasis placed on cooperative manpower planning since 1974, there is still variation among the states on the extent to which they have taken the BEH directive seriously. Whereas the enforcement of the directive is ultimately the responsibility of the Division of Personnel Preparation at the Bureau, the Missouri project simply endeavors to be of assistance to states in the implementation of the directive. Accordingly, in 1976 we conducted a status study in an attempt to determine what was taking place throughout the country in terms of cooperative manpower planning, and we are now preparing to update the data we gathered then. Some of the findings are significant to trainers and public school people alike:

1. Seemingly, just about all of the states now have some type of cooperative manpower planning committee, at least in name. However, the extent to which these committees are involved in statewide planning varies considerably.

2. In some cases, confusion exists as to the name and functions of the

committee. In one state, when we asked four respondents the name of their committee, we received four different answers. Therefore, additional work may be necessary to make professionals more aware of their committees.

3. As far as committee membership is concerned, the two constants are college and university participation and state education agency participation. In addition, local education agency membership exists in the vast majority of states. Beyond these entities, committees have varied representation, including people from departments of mental health, voluntary health organizations, vocational rehabilitation agencies, and other groups. Nor are parents and regular school personnel strangers to committee membership.

Committee membership

4. Most state committees average four to five meetings per year, but the range is from one meeting per month to only one meeting per year. Subcommittees and task forces also meet at various times.

Frequency of meetings

5. An item that has persistent implications is the matter of special funding for the operation and maintenance of the various state manpower planning committees. Thirteen states reported some type of special funding to assist these committees. In most instances this involved Part D monies—usually the state education agency's Part D monies. This means that the state would include, as a component of its Part D proposal, some assistance to the state cooperative manpower planning program. There is no question that this funding, usually in the neighborhood of \$10,000 to \$15,000 per state, has enabled many committees to accomplish things that would otherwise have taken much longer to achieve. It is also true that, in general, states providing some kind of special funding are able to do more in cooperative manpower planning than states that provide no support.

Funding for committee operation and maintenance

The funds themselves are used in various ways:

- As travel allowances to permit more frequent meetings of committees, subcommittees, or task forces.
- For the publication of newsletters and other reports, thus ensuring greater communication among committee members and task force participants, and for awareness of committee work throughout the state.
- To pay for postage and mailing necessary in needs assessment studies.
- As salaries for a part-time coordinator, secretarial assistance, and other personnel.

6. One of the more interesting issues we approached, and one that remains a problem, relates to how the respondents characterized their own state's cooperative manpower planning committee. More often than not, they described their state's committee as "... a formally organized committee, but with little or no decision-making authority." This reported lack of clout does not correspond to what is required in the manpower and training sections of Public Law 94-142:

Decision-making authority

Section 613(a) . . . (3). set forth, consistent with the purpose of this Act, a description of programs and procedures for (A) the development and implementation of a comprehensive system of personnel development which shall include the inservice training of general and special educational instructional and support personnel, detailed procedures to assure that all personnel necessary to carry out the purposes of this Act are appropriately

and adequately prepared and trained, and effective procedures for acquiring and disseminating to teachers and administrators of programs for handicapped children significant information derived from educational research, demonstration, and similar projects and (B) adopting, where appropriate, promising educational practices and materials development through such projects . . .¹⁶

Section 614(a)(1) . . . (c) establish a goal of providing full educational opportunities to all handicapped children, including (i) procedures for the implementation and use of the comprehensive system for personnel development established by the state educational agency under section 613(a)(3).¹⁷

On this basis, if each state is to participate fully under the provisions of the new law, then each state must establish and implement a comprehensive system of personnel development. It seems logical that primary leadership for this activity should emanate from each state's cooperative manpower planning committee, for it is this committee and the state education agency that have the expertise and the knowledge base to develop vital and functional personnel development systems.

The personnel development section of Public Law 94-142 will have great impact on all of those concerned with the supply of professional manpower.

The personnel development section of Public Law 94-142, cited above, will have great impact on all of those concerned with the supply of professional manpower. This impact rests not only with university training programs, but with state and local education agencies as well. Each state education agency must submit an annual program plan describing its participation under Public Law 94-142, and each of these programs must "include a description of programs and procedures for the development and implementation of a comprehensive system of personnel development. . . ."¹⁸ The primary focus of this comprehensive system of personnel development is on inservice training. However, when considering this comprehensive system, it seems that a state would also have to look at what is taking place in preservice training, inasmuch as the numbers and types of people being trained within a state at the preservice level will affect the nature of inservice training that is needed. In addition, the training resources that exist at the preservice level are usually critical for the creation of effective inservice training programs.

The regulations for Public Law 94-142 also require that, within a given state, all colleges and universities that have an interest in special education personnel training have "an opportunity to participate fully in the development, review, and annual updating of the comprehensive system of personnel development"¹⁹ At this point, comprehensive manpower planning should enter the picture. Those states that have functioning manpower planning committees should broaden the scope of the committees to encompass many of the responsibilities included under Section 613(a)(3) of the law. It does not seem efficient for a state to have two committees that focus on the same things: manpower planning, personnel development, and teacher training concerns. Why have one group that is concerned only about Part D funds (i.e., the BEH directive) and another group that is concerned only about Section 613(a)(3) of Public Law 94-142? If the Part D persons and the Public Law 94-142 persons within a state education agency are communicating and working together, and if college and university people are involved, then these matters may be meshed into a workable whole for one committee.

The bottom line of all of these matters is the fact that inservice training is going to be very big business as time passes. Local education agencies are going to be extensively involved in this training, as will state education agencies. For the first time, the local districts will have substantial funding to carry out inservice programs. It is most important that teacher educators have an opportunity for input into the nature of the inservice programs that will be supported through Public Law 94-142. Certainly college and university personnel have expertise in training and the delivery of instruction.

Inservice training is going to be very big business.

Moreover, the cooperative manpower planning committees, if they are involved in the Section 613(a)(3) provisions of the Act, can serve as quality control agents in relation to inservice training within a state. In addition, many areas of potential conflict between institutions of higher education and state departments may be avoided in this manner. Effective training requires a partnership among many groups and agencies. Cooperative manpower planning can be the vehicle for attaining that partnership.

⁹ Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

¹⁰ Bureau of Education for the Handicapped/Division of Personnel Preparation. *Cooperative planning for personnel preparation*, April, 1974.

¹¹ Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

¹² Schofer, R. C., & McGough, R. L. *Proceedings of the First Missouri Symposium on Cooperative Manpower Planning for Special Education*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, May, 1976.

¹³ Schofer, R. C., & McGough, R. L. *Statewide cooperative manpower planning in special education: A status study*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, November, 1976.

¹⁴ McGough, R. L., & Schofer, R. C. *Cooperative manpower planning: Annotated bibliography*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, October, 1976.

¹⁵ Schofer, R. C., & McGough, R. L. *Manpower planning for special education: Planning model and alternatives*. Columbia, Missouri: University of Missouri-Columbia, Department of Special Education, August, 1977.

¹⁶ Public Law 94-142. Education for All Handicapped Children Act of 1975, Section 613(a)(3), November 29, 1975.

¹⁷ Public Law 94-142. Education for All Handicapped Children Act of 1975, Section 613(a)(3), November 29, 1975.

¹⁸ Department of Health, Education, and Welfare, Office of Education. *Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act*. Comprehensive system of personnel development. *Federal Register*, Tuesday, 42(163), August 23, 1977, Part II.

¹⁹ Department of Health, Education, and Welfare, Office of Education. *Education of handicapped children: Implementation of Part B of the Education of the Handicapped Act*. Comprehensive system of personnel development. *Federal Register*, Tuesday, 42(163), August 23, 1977, Part II.



INSERVICE PROGRAMMING AND PRESERVICE PRIORITIES

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APPROXIMATELY 250,000 teachers are working in special education in this country today, and their rate of attrition is around 6 percent. A few more than 25,000 new people enter the field each year after completing preservice training, but, when the attrition rate is considered, this leaves only about 10,000 additional teachers who enter the manpower pool annually. However, to serve between 7 and 8 million children, we know that we need 500,000 teachers and support personnel. Since we also know that many of these children must be served in the least restrictive environment of the regular classroom for at least part of the school day, it becomes clear that a large group of the 250,000 additional personnel we need must be recruited and retrained from the ranks of regular educators. It will not be possible to give these youngsters the best education unless regular teachers understand exceptional children and how to work with them. Thus, a major area of development, both now and in the future, will be the comprehensive inservice training of regular educators.

The Division of Personnel Preparation of the Bureau of Education for the Handicapped has been supporting the training of regular educators since 1974, and, for the current fiscal year, over 48 percent of its budget (or \$26,858,000) is available for inservice training. A significant portion of this amount was appropriated by the Congress specifically for the development of inservice programming, and thus the Bureau's allocations must be tracked by means of separate and distinct proposals that address this priority.

Simply addressing the priority, however, is not enough. The Division of Personnel Preparation is not interested in perpetuating the inadequacies and disappointments that have traditionally occurred in the inservice training of teachers over the years. The Division is interested in the underwriting of projects that will help all personnel contributing to educational programs for handicapped children to develop the necessary attitudes, skills, and knowledge to carry out their responsibilities under Public Law 94-142. Such projects should provide for inservice in all of its dimensions, and should be characterized by productive interaction. To do so, they must be needs based, conducted over time, evaluated, and recycled,²⁰ and they must demonstrate cooperative planning with local school district personnel, including representatives of the various audiences that will be trained. In addition, they must have a plan for reporting the results of training *in the form of performance data from trainees and from children*.

One-shot workshops are not sufficient; training must address, over time

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One-shot workshops are not sufficient.

and in depth, the knowledge and skills needed to teach children with a specific disability in a specific subject area, in terms of: systematic teaching from an individualized educational plan; decisions about assessment procedures, skills, roles, objectives, and materials; effective communication and cooperative planning with others, including professionals, parents, and students. We are also encouraging consortium arrangements among local education agencies, as well as collaboration between these consortia and institutions of higher education. Moreover, inservice support projects will be needed—projects that provide preparation for those who actually train various target audiences. This kind of training may focus, for example, on special education content, successful and operational service delivery systems, or other skill areas needed for the creation of professional development programs.

In August 1977, an advisory group developed a set of recommendations to inservice practitioners.

As part of the division's effort to develop a nationwide inservice delivery system, an advisory group was convened on August 25 and 26, 1977, and was charged with developing a set of recommendations to inservice practitioners. Their recommendations supplement the Division's position that the implementation of Public Law 94-142 will occur in our nation's schools, and that the Division's responsibility is to ensure that appropriate personnel are adequately trained through inservice programs to carry out their responsibilities under the law. The advisory group's major recommendations are organized according to major headings from Office of Education form 9049, 9/75, *Proposal Evaluation-New Applications*, and are summarized as follows:²¹ It is recommended that proposals:

Need

- Respond to those manpower development needs identified in local and/or state education agency annual program plans, and provide data demonstrating this relationship.
- Be consistent with the content of a state's comprehensive system of personnel development or provide justification based on data for alternative directions.
- If presenting data from a needs assessment, ensure that those data represent the perceptions of need identified by both regular and special educators; all concerned constituencies should be involved in the assessment of special education inservice needs.

Impact

- Specify target training audiences and describe the impact of the training on each of the audiences. The selection of training audiences and the description of the proposed impact should be expressed in terms of the implementation of Public Law 94-142, at the local school level.
- Clearly identify the anticipated outcomes of the training in terms of changes in attitude, knowledge, skills. The impact should be described for each target training audience.
- Report projected impact by target audiences, schools, school districts, intermediate units, and so forth, if serving a consortia of local education agencies.

Planning

- Reflect an understanding of the requirements of state and federal regulations.
- Provide evidence that the initial planning included the input of representatives of the various target training audiences.
- Provide a plan which describes procedures for continuing input from the target training audience.

- Report program objectives and actual instructional sequences for each target training audience.
- Outline specific procedures to ensure that program objectives and instruction relate to a comprehensive set of teacher behaviors which have been agreed upon by the participants of the program, and that these teacher behaviors facilitate progress toward child goals identified in their individualized educational plans.
- Include on-the-job follow-up of the training as part of the instructional program.
- Contain evidence that project personnel were selected via a system for identifying and utilizing available human resources for inservice training. This includes human resources in the school and those relating to the school, such as institutions of higher education, state education agencies, intermediate education units, or diagnostic centers and, in general, personnel serving handicapped persons in the same geographic area.
- Include procedures for multiplying or expanding the effects of the program beyond the initial direct participants.
- Outline a dissemination plan for enabling others to replicate the project.
- Describe the relationship between this special education inservice program and other inservice programs serving the school.

- Relate the content and organization of the inservice program to each participant's professional development, and show that personalized or individualized instruction modeling the child's individualized educational plan is encouraged.
- Cite and discuss relevant inservice research regarding both special and general education.
- Have at least some building-based activities with principals in alternate roles of leadership and learning.
- Include specifically delineated content for either the entire inservice program or part of the program, with specific procedures identified for determining the content of the entire program.
- Delineate the sites and times of program activities as agreed upon by those concerned.

Procedures

- Provide statements of policy and data which assure quality control for staff selection and performance, including provisions for participant evaluation of the program leader's performance.
- Make peer training a feature of the program.
- Show that school-based personnel provide assistance in follow-up activities, both training and evaluation.

Staff

- Set aside a specified amount of project funds (5 to 10 percent) for evaluation.
- Include in the evaluation design the systematic assessment of children and of participants on the job.
- Include parents and students as important sources of evaluative data.
- Include evaluative data that may be composed of: attitude change, knowledge gain, skill development, and organizational change, as well as any data that show that Public Law 94-142 is being implemented as a result of inservice training.

Evaluation

- Relate to a comprehensive set of teacher behaviors that have been agreed upon by participants of the program.
- Include milestones for feedback from participants for the purpose of possible program modifications. This section should identify these decisions, report the type of data to be collected, and discuss possible modifications.
- Specify an evaluation design consistent with program objectives and identify evaluative procedures for the various target groups receiving training.

Project Support

- Include a specific time line for phasing out funding from the Division of Personnel Preparation.
- Include a plan ensuring that the local education agency will, within a specified period of time, assume as much of the primary responsibility for the inservice program as possible, with other agencies in supportive roles.
- Contain a description of organizational structures that exist or are planned to support participatory planning, implementation, and evaluation as evidence of organizational commitment.

Although the foregoing recommendations do not represent a directive, they are the best suggestions that the Division can offer at this time to those who desire to establish comprehensive programs of inservice training for general educators. Additional recommendations from the field will be welcomed by the authors.

To spur some needed activity, the Division's 1978 grant application packet included a direct request for proposals relating to inservice training for regular educators and administrators. As a result, 140 regular education projects were funded. Included in that number of projects are nine national projects, selected by the BEH regular education inservice advocates for two purposes:

- To represent the 140 projects in the design of a national inservice network which will involve all DPP regular education inservice projects, and
- To explore methods of cooperation among these nine projects, which may become the model for all projects in the entire inservice network.

The primary purpose of the network is to link and share resources among the regular education inservice projects, and thus eliminate duplication of effort. All members of this new national inservice network must be prepared to alternate between their role as trainer and their role as learner.

This emphasis on inservice programming does not mean that we are not going to attend to preservice training. Our policy is to strike a balance between preservice education and inservice education. In the 1978 application packet there was also a request for proposals for the preparation of doctoral level personnel in the area of the visually handicapped. As a result, eight doctoral programs were funded to prepare personnel to serve visually handicapped children. The 1979 application packet still emphasizes the need for preservice training. At our present manpower level, with 250,000 people in place, attrition is costing us about 15,000 professionals each year. The only way we are going to continue to have their replacements is through preservice education, which is also the primary way that we may attend to certification.

Our priorities and the amount of money assigned to each (Table 6) underline our commitment to preservice training, particularly in the areas of early

Preservice education is our fundamental answer to attrition, and to certification.

childhood, severely handicapped education, paraprofessionals, physical education, recreation, vocational and career education, and training for interdisciplinary programming. Two target areas that need attention on a highly selective basis are career and vocational education and doctoral programs for the hearing impaired. Moreover, there are only a few training programs in the nation that are preparing people to deal with autistic children and other severely emotionally disturbed children, and so considerable funding needs to be directed to this area also. Staff within the Division of Personnel Preparation continue to be concerned that applications received for the most recent funding period paid little attention to the needs of the Native American child or youth who is handicapped, and a further concern has been inattention to the needs of bilingual populations across the country.

The training of speech/language pathologists is also of major importance in all priority areas. The experiences, knowledges, and skills of the pathologist working with communicatively handicapped children, their families, and other professionals need to be addressed in both preservice and inservice programs. Secondary students with language disorders require interventions designed by and with clinicians who have insights into their social, educational, vocational, and emotional growth patterns. The severely and profoundly handicapped have shown dramatic improvements when speech/language pathologists work with other appropriate personnel in programs designed to assist children, families, and others in changing their environments. The need for bilingual speech/language pathologists continues to remain a high priority as does training of regular educators and administrators regarding the importance of speech and language in the adjustment and educational welfare of children. Applicants should refer to the Public Law 94-142 regulations regarding the need for professionals to assist communicatively handicapped children and youth from birth to age 21; in the regulations, the word "language" is not restricted only to oral communication. Applicants are also encouraged to seek advice from practicing clinicians to ascertain their local and regional needs.

Thus, in addition to established priority needs, there are also neglected programs and populations that must be considered. Moreover, diverse groups of people need training. These are complex times in special education. We no longer have "the silver bullet," or the unidimensional solution to our problems. To offer early childhood programs, for example, our people need to collaborate with child care and Head Start projects and bring to their work a thorough understanding of child development. To teach the severely and profoundly handicapped, one must relate to medical personnel, rehabilitation specialists, occupational and physical therapists, nutritionists, and others. Those preparing to work with seriously disturbed youngsters will need to relate to mental health centers and private clinics, while those of us preparing general special educators must understand the organizational dynamics and goals of teachers' organizations and unions. Finally, it is of exceeding importance that teachers and support personnel are skilled not only in counseling parents but in bringing them into active roles in their children's education. Thus, interdisciplinary training needs to take place in every area of personnel preparation, and this is an area in which we have a long way to go: programs are often too constrained and one-dimensional.

In reality, the roles of teachers have changed and are continuing to change. The teacher is now a prime institutional advocate, a coordinator of assessment, a coordinator of remediation, a troubleshooter, the hub of a team composed of various professionals, and the person responsible for the individualized

*We no longer have the
"silver bullet" in special
education.*

educational program. It is on the IEP that the entire issue of an *appropriate public education* hinges. The question of appropriateness leads directly to the issue of constitutional rights. Thus, our most significant task may well be the determination of appropriateness. Part of the answer will lie in whether or not we are helping personnel to prepare not just for the mechanics, but also for the dynamics, of individualized educational planning; whether the personnel we train will be competent in demonstrable ways; and whether we ourselves are competent.

In our concern for preservice programming, an area of particular interest is the preservice training of general educators—the Dean's Grant program. The philosophy behind these grants is to provide an opportunity to deans of schools or colleges of education to reconceptualize the preparation curricula so that the needs of handicapped children may become an integral part of teacher training, rather than an afterthought. This is change from within, and the intent is to end the separation of handicapped from non-handicapped children throughout the entire educational community. Thus, the Dean's Grant program encompasses both graduate and undergraduate programs. In order to touch all aspects of public school responsibility, the focus is not only on the potential classroom teacher but also on the career education of principals, supervisors, and all others involved in educational services.

*The Dean's Grant program
is a massive change agent.*

Because the key to the success of Dean's Grants is the authority, responsibility, and decision-making capability that will bring about change, the Dean himself should act as project director. In specific cases, however, a person in an equal position with equal authority can also be considered to direct the project. This kind of leadership is necessary because the Dean's Grant is a massive change agent, an innovation to be adopted throughout the college of education and its faculties.

Procedures for Dean's Grant application, evaluation, and program approval are the same as those for every other project submitted to the Division of Personnel Preparation. The three-year program approval can be renewed, if necessary. There is, however, no formula for the success of a Dean's Grant; its activities and objectives can be defined only by those at the institution of higher education. Since enduring change must come from within, deans must suggest to us their own perceptions of their institutions, and the unique ways by which this kind of innovation may be brought about.²²

In the same sense that inservice training of general educators will lead to education in the least restrictive environment for the mildly and moderately handicapped, the Dean's Grant program will add considerably to the body of professionals who will be effective with these youngsters in the regular classroom. If eventually *all* professionals were prepared to serve *all* children, many educational problems of handicapped children would be solved. For that reason, the Dean's Grant program is of great significance.

*We must adjust our sights
to get the right things done
and to see the problems
through.*

In matters of meeting critical manpower needs, of ensuring expertise among regular educators, and in recruitment, the Division of Personnel Preparation is responsible, in the long run, to the Congress. If the House or Senate requests a report on how the budget has been spent, its members want to know exactly where the money is. For this reason, professionals in the field need to understand the budget and priorities. This Division gives financial support to continuation grants and to new grants; it does not deal with

noncompeting new grants. Proposals must, therefore, attend to target priorities that are fundable. Simply because a program received \$200,000 last year does not necessarily mean that it will receive \$200,000 this year. The Division's basic budget has not increased appreciably in the past three years, and this puts us all in a difficult position. We must adjust our sights in order to get the right things done and to see the problems through. The purpose of this chapter has been to define what some of those right things are.

²⁰ Harvey, J. Education for the handicapped regulations. In *Teacher centers as an approach to staff development in special education: Conference report*. Newport, Rhode Island: Rhode Island Teacher Center, June 5-7, 1977. (Published by ERIC Clearinghouse on Teacher Education, Suite 616, One Dupont Circle, Northwest, Washington, D. C. 20036)

²¹ Bureau of Education for the Handicapped/Division of Personnel Preparation. Information bulletin #1: Informal letter to inservice practitioners. September, 1977. (Copies may be requested from the Division of Personnel Preparation, Bureau of Education for the Handicapped)

²² Behrens, T., Chief, Eastern Region Branch, Division of Personnel Preparation, Bureau of Education for the Handicapped. Personal communication, November 15, 1977.





INNOVATION AND EVALUATION IN PERSONNEL PREPARATION

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IN ADDITION to providing program assistance for preservice and inservice training, the Division of Personnel Preparation awards Special Project grants for the following purposes:

1. To design personnel preparation programs that, upon implementation and evaluation, may be more effective and efficient than current operational preparation programs;
2. To identify major problems relevant to the preparation of personnel for the education of handicapped children and to develop procedures for the solution of such problems.²³

When the funding of Special Projects began in 1968, we were engrossed with innovative programs and new approaches that met the first expressed purpose of these grants. The aim was to have an impact on specific areas of development—areas that were little understood in terms of the directions that should be taken. Thus, earlier projects were primarily concerned with pure model implementation, and, through these grants, the initial efforts in early childhood and resource teacher training were made possible. In recent history, the education of the severely and profoundly handicapped has also benefitted from a concentrated effort.

Within the past few years, because of the difficulties associated with preparing to implement Public Law 94-142, the second purpose of the Special Projects has become quite prominent. As we have moved toward the development of solutions for major training problems, we have also underwritten programs in evaluation training, dissemination, and manpower planning—all of which are intended to assist in the creation of effective approaches to solving these problems. Proposals for these projects are becoming more sophisticated and comprehensive. In 1977, requests for Special Project monies exceeded for the first time the budget the Division could spend. Of the 126 programs considered, 39 were continuations and 87 were new grants. In the final analysis, 39 continuations and 20 new grants were awarded. It was necessary to create the category “approved without funding” for 16 projects in recognition of the quality of some of the proposed programs that could not be funded. (A directory of all Special Projects funded between 1968 and 1977 has been published.²⁴)

While the Special Projects budget represents the risk capital of the Division of Personnel Preparation, the projects themselves are intended to be of national

Special Projects have moved toward problem-solving and away from pure model implementation.

* In August 1978, Dr. Burke became Chairman of the Department of Special Education at the University of Maryland.

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*Six years ago, the field was
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*The Discrepancy
Evaluation Model defines
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comparison of what is, a
performance, to an
expectation of what
should be, a standard.*

importance, and the risks are taken for the purpose of propelling programs toward the cutting edge in the advancement of education for handicapped children. Over the past several years, we have experienced a shift in emphasis, a philosophical change. We are now less concerned with the question of what is new, and much more concerned with the question of what is good. The latter is a crucial issue, reflecting a maturing process that requires professionals to identify the current and projected needs of teachers and trainees, to make well considered plans, and to conduct programs that can be shown to demonstrate improvement in personnel preparation practices. These objectives relate directly to our concern for the validation and dissemination of programs.

This concern for what is good holds true not only for the Special Projects but also for every program supported by the Division of Personnel Preparation. It is, moreover, a concern that has grown over a period of years. In 1971, when the Division began the funding of program assistance grants, a national meeting was held in Washington—the Division's first major interaction with the field in that kind of setting. A critical factor introduced at that meeting was the requirement for evaluation designs as part of program assistance grants. A glance through the 1971 proposals would reveal ample evidence that considerable work was needed on everyone's part to meet this requirement. For example, many proposals included no mention of evaluation, and those that did rarely included more than a one-page description of some activities. Most did not describe a design but merely a series of incidents without pattern. And because the field was not particularly data conscious six years ago, there was little provision for using evaluation data to modify programs.

Out of the expressed need for assistance in the development of adequate evaluation plans, the University of Virginia's Evaluation Research Center undertook an extensive effort to create an appropriate evaluation system for personnel preparation programs. Because of its wide use in educational settings and its high potential for facilitating the management of complex personnel preparation efforts, the Discrepancy Evaluation Model was selected for two years of field testing. Subsequently, a workshop, supportive materials, and a program of technical assistance were developed.

The Discrepancy Evaluation Model seeks to provide information about educational programs to meet two purposes: improvement and assessment. The . . . model focuses on the program as a whole; it is not a model for teacher evaluation, nor for evaluating student performance, although both these activities can, and often do, take place within the scope of the general model. Like most models, the Discrepancy Evaluation Model is not value-free. It is based upon certain premises, the most important of which are stated below:

- Evaluation is essentially a constructive activity. In most cases, information must be collected to *improve* programs before valid information can be collected to assess them.
- Like education, evaluation is both an art and a science.
- Evaluation works best when there is broad participation in all evaluation activities, and when program staff function in an atmosphere where they feel a freedom to admit error, make revisions, and risk failure creatively.

The Discrepancy Evaluation Model defines "evaluation" as the comparison of what is, a performance, to an expectation of what should be, a standard.

If a difference is found to exist between the standard and the performance, this difference is known as a discrepancy. Discrepancies may be positive, where performance exceeds the standard, or negative, where performance is less than the standard. Whereas positive discrepancies are usually welcome, negative discrepancies generally cause concern. Negative discrepancies may be resolved in three ways: an unrealistic standard may be reformulated or redesigned; management may exert greater control over performance; or, if the discrepancy is unmanageable, a program may be terminated.²⁵

The purposes, then, of the Research Evaluation Center's training program are to assist personnel preparation programs in creating designs that would:

- Yield information on the total effectiveness of the program.
- Provide the means for changing or improving the program.
- Develop the capacity for determining whether the program is meeting its objectives.
- Lead to the development of program standards.
- Provide a description of program activities and their sequence.²⁶

The model provides for clearly stated goals and a description of program components that will achieve the goals, expressed as interdependent parts that include antecedent prerequisites, activities, intended outcomes, and their relationship to other program activities. Next, the focus is on evidence that a program has in fact operated successfully, e.g.:

- Did trainees meet their training objectives?
- Do trainees meet the needs of their profession?
- Were resources spent effectively?
- Have related programs been affected positively by this program?
- Have critical resources been obtained?
- Have critical preconditions been met?
- Are activities being carried out according to plan?
- Are interim objectives being met?

The method for collecting data relative to these concerns about successful program operation includes describing the information to be collected, devising procedures for collecting it, developing a data collection instrument, carrying out a data collection plan, and analyzing and reporting data.

After training had begun and the new proposals had arrived for fiscal 1975, we made a comparison among proposals submitted by people who had not received training, people who had received workshop training, and people who had received both workshop and clinic training by the Research Evaluation Center.²⁸ Reviewers' comments on these proposals revealed that evaluation plans prepared by trained professionals were significantly better than those submitted by untrained professionals (Table 7).

Equally important, Table 8 indicates that reviewers found a marked difference between *the total programs* proposed by trained and untrained professionals on all criteria except staff. In addition, the better overall proposals also had the superior evaluation designs. The implication is that evaluation training has enabled people to plan entire training programs more effectively. Our 1976 study replicated these findings, and, since over 500 program personnel have now received training in evaluation, we can only conclude that total program quality has been enhanced.

The model progresses from description of goals to analysis and reporting of data.

Evaluation plans prepared by trained professionals receive better ratings from field reviewers.

TABLE 7
Field Rater Comments on Evaluation Plans

Percentages of Yeses on Individual Evaluation Items by Treatment Groups for Field Raters					
Variable	Control	Work- shop	Work- shop/ Clinic	X ²	p
N ¹ =	104-112	61-65	71-77		
1. Evaluation methodology	56.8%	76.9%	79.2%	13.39	.001
2. Kinds of data collected	53.6%	69.2%	79.7%	13.87	.001
3. Criteria used to evaluate results	51.8%	68.3%	72.7%	9.79	.01
4. Procedures for assessing competencies	56.0%	76.6%	77.3%	12.36	.01
5. No. of grads prepared and placed by role	45.0%	75.8%	81.8%	31.56	.001
6. Position taken by grads	45.0%	74.2%	84.0%	32.02	.001
7. Graduate length of service	34.3%	60.7%	59.2%	15.58	.001
8. Graduates proficiencies as judged by employers	40.2%	67.7%	73.7%	24.63	.001
9. Method of assessing effective use of resources	44.5%	56.3%	57.5%	3.77	N.S.
10. Method for assessing impact on institution and community	33.0%	56.5%	49.3%	10.21	.01

1. Sample size varies due to missing data.

TABLE 8
Field Rater Comments on Total Programs

Results of One Way ANOVA by Variables for Field Raters Across Treatment Conditions ¹					
Variable	MEANS			F Ratio	Prob.
	Control	Workshop	Workshop/ Clinic		
N =	104-112	61-65	71-77		
1. Ed. Significance Need	3.16	4.03	3.89	11.39	<.001
2. Ed. Significance Impact	2.93	3.75	3.83	12.48	<.001
3. Program Design Planning	2.87	3.52	3.82	10.91	<.001
4. Program Design Procedures	2.76	3.48	3.69	12.13	<.001
5. Program Design Staff	2.96	3.14	3.28	1.38	N.S.
6. Evaluation ²	2.57	3.26	3.82	15.70	<.001
7. Support for Project	2.81	3.35	3.48	6.27	<.01
8. Evaluation Scale	4.46	6.65	7.00	15.31	<.001

1. With the exception of variable 5 (staff), significant differences between a combination of the workshop and workshop/clinic group compared with the control group were found using the Scheffé procedure.

2. Field raters also rated the workshop/clinic group significantly higher on overall evaluation than the workshop group, according to the Scheffé procedure.

Finally, Tables 9 and 10 show that 66.7 percent of proposals submitted by untrained staffs were disapproved by Division project officers, while 60.7 percent of these were disapproved by field readers. Project officers approved only 9.8 percent of such proposals, while field reviewers approved only 16.1 percent. Thus, it can be concluded that better evaluation plans get more federal dollars.

Better evaluation designs get more federal dollars.

TABLE 9
Funding Disposition by Project Officers

Results of Crosstabulation for Project Recommended Funding Disposition by Treatment Group for <i>Project Officers</i>				
Disposition	GROUP			
	Control	Workshop	Workshop/ Clinic	
Funding				
Disapproval	66.7%	23.3%	17.2%	
Deferral	0	0	3.4%	
Provisional				
Acceptance	23.5%	43.3%	44.8%	
Approval	9.8%	33.3%	35.5%	
N =	51	30	29	110
X ² = 27.34 d.f. = 6 p < .001				

TABLE 10
Funding Disposition by Field Raters

Results of Crosstabulation for Project Recommended Funding Disposition by Treatment Group for <i>Field Raters</i>				
Disposition	GROUP			
	Control	Workshop	Workshop/ Clinic	
Funding				
Disapproval	60.7%	24.6%	19.7%	
Deferral	7.1%	7.7%	3.9%	
Provisional				
Acceptance	16.1%	40.0%	50.0%	
Approval	16.1%	27.7%	26.3%	
N =	112	65	76	253
X ² = 46.13 d.f. = 6 p < .001				

The greatest need in evaluation planning that currently exists, according to our colleagues in the field, is that of selecting or constructing instruments to collect data that will answer evaluation questions. To help meet this need, the Evaluation Research Center has added clinics on instrumentation design, which

Instrumentation for data gathering is the greatest current need.

are now in progress. On the other hand, the writing of proposal designs, considered a prime need five years ago, is no longer seen as a critical issue in the field, and this indicates that the proper homework is being done on the fundamentals of evaluation planning. Obstacles continue to exist, however, in obtaining fiscal support for evaluation activities, in engaging faculty involvement in evaluation activities, in locating and using measurement expertise, in simply finding the time to carry out evaluation plans properly, in persuading decision-makers and faculty committees to use evaluation data, and in managing and organizing to implement and use evaluation for program improvement.

This year and in the future, the Division of Personnel Preparation will look seriously for reports of data that is collected.

The purposes and uses of collected data are current concerns of the Division of Personnel Preparation. Although more data are being collected now than ever before, programs are not yet reporting the data they are gathering. Without the use of this information for improvements and modifications of training programs, evaluation itself is pointless. Part of the answer lies in the fact that second-year continuation proposals must be submitted before program staffs can get a start on implementing their designs, but this explanation is, obviously, good for one year only. This year and in the future, the Division of Personnel Preparation will look seriously for reports of data that are collected, and how data are being used for course correction.

Our progress in evaluation over the past five years has been immense. Programs are far more evaluation conscious than ever before, evaluation plans are vastly improved, most programs include formal evaluation assignments among faculty and students, instruments are being designed, and more data are being collected. The task before us is the full reporting of that data, and adequate use of it for the purpose of constantly refining and upgrading programs of personnel preparation.

The Joint Dissemination Review Panel assures that dissemination of educational practices is matched by a guarantee that what is disseminated is exemplary.

Another purpose of data collection and reporting is the possibility of program validation by the Joint Dissemination Review Panel of the Office of Education and National Institute of Education. This 22-member panel has been in existence for four years, with the objective of assuring that the dissemination of educational methods is matched by a guarantee that what is disseminated is exemplary. By means of the Panel, when a division or bureau of the federal government says that a program, practice, or product is worthy of replication, the assertion will have something substantial behind it.²⁹

The criteria that the Panel seeks in validating programs focus on three issues: "(1) is there evidence that anything important happened that is consistent with the stated claims, (2) that what happened is generalizable, and (3) can this credibly be attributed to the product or practice?"³⁰ In other words, there must be objective evidence that things were different after using the product or practice than they were before. If this evidence is conclusive and leads to validation, then the validated program is eligible for an Office of Education developer/demonstrator grant for the purposes of replication and outreach work.

No personnel preparation program has received validation by the Panel.

To date, no personnel preparation program has received validation by the Panel. However, we are now finding that more than a few of our programs are in fact collecting the kinds of data that would lend themselves to validation. Thus, we are spending considerable energy endeavoring to locate these programs, assist them in preparing for validation, and bringing to their attention the various possibilities for dissemination that exist for them.

The replication of exemplary programs, particularly in the inservice area, is much to be desired. The first step toward this goal is collection of information that will prove that our programs work. That proof rests with our expertise in evaluation, data collection, and data reporting.

The first step is the collection of information that will prove that our programs work.

²³ *Code of federal regulations*. 45 CFR. Public Welfare, Parts 100–199, Chapter 1. Washington, D.C.: Department of Health, Education, and Welfare, Office of Education, 1976. (A bound copy of current regulations relating to grants and contracts may be purchased for \$10.00 from the Superintendent of Documents, U. S. Government Printing Office, Washington, D. C. 20402.)

²⁴ Teacher Education/Special Education. *A list of special projects funded by the Division of Personnel Preparation, Bureau of Education for the Handicapped, U. S. Office of Education, 1968–1977*. Albuquerque: Teacher Education/Special Education, University of New Mexico, August, 1977.

²⁵ Yavorsky, D. K. *Discrepancy evaluation: A practitioner's guide*. Charlottesville: University of Virginia Evaluation Research Center, 1976, p. 5.

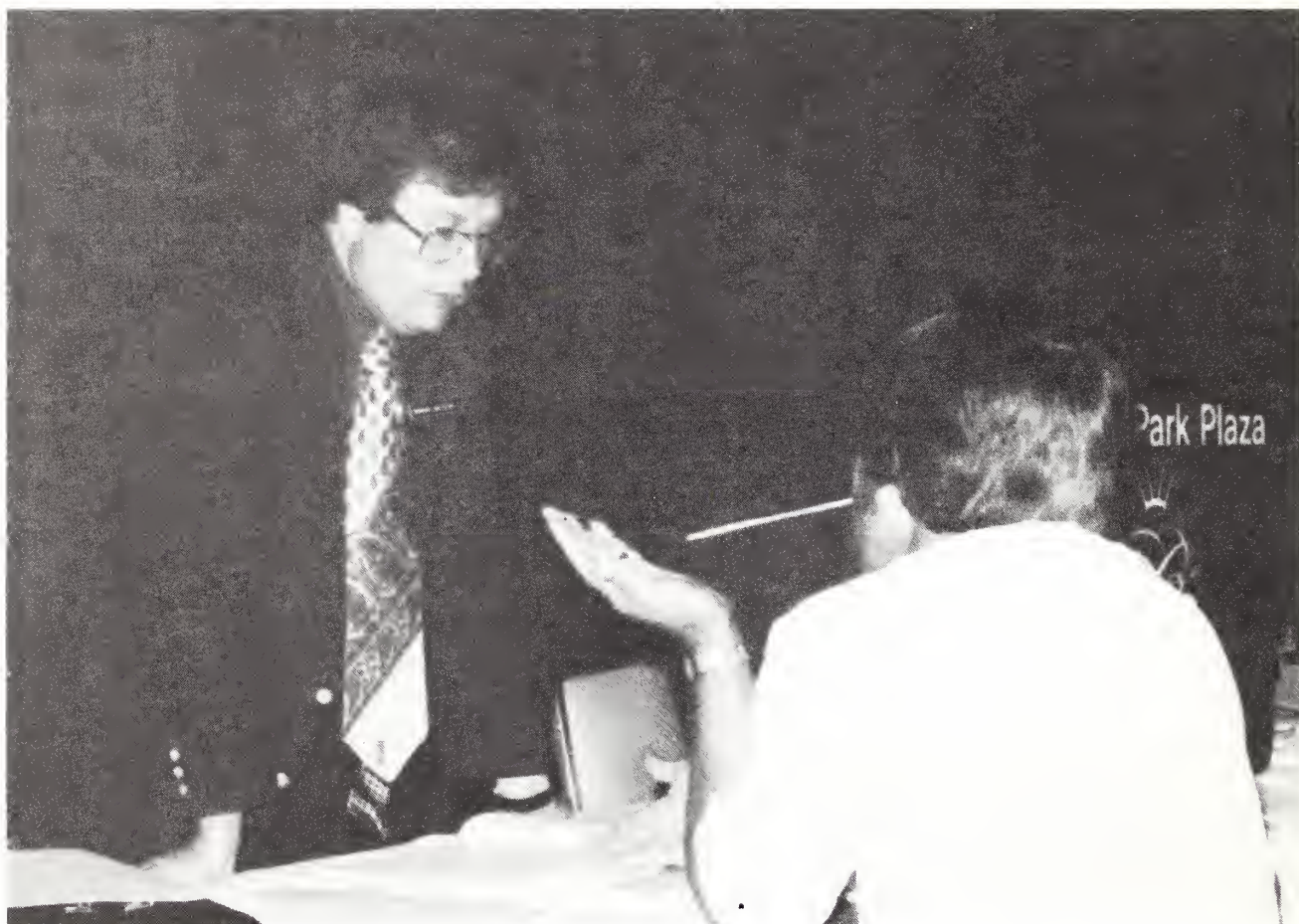
²⁶ Yavorsky, D. K. *Discrepancy evaluation: A practitioner's guide*. Charlottesville: University of Virginia Evaluation Research Center, 1976.

²⁷ Yavorsky, D. K. *Discrepancy evaluation: A practitioner's guide*. Charlottesville: University of Virginia Evaluation Research Center, 1976.

²⁸ Brinkerhof, R. Unpublished paper on evaluation, prepared for the staff of the Division of Personnel Preparation, Bureau of Education for the Handicapped, 1976.

²⁹ Office of Education. The Education Division's Joint Dissemination Review Panel (JDRP): Purpose, procedures, and criteria. Washington, D. C.: Office of Education, Department of Health, Education, and Welfare, October 15, 1976.

³⁰ Office of Education. The Education Division's Joint Dissemination Review Panel (JDRP): Purposes, procedures, and criteria. Washington, D. C.: Office of Education, Department of Health, Education, and Welfare, October 15, 1976.



DISSEMINATION



GARY ADAMSON AND JUDY SMITH

Teacher Education/Special Education
University of New Mexico Dissemination Project
Albuquerque, New Mexico—Alexandria, Virginia

Teacher Education/Special Education is a national project designed to develop four levels of intercommunication on professional preparation programs. Funded as a Special Project by the Division of Personnel Preparation, Teacher Education/Special Education was established to contribute to mutual awareness, contact, and transfer of expertise among inservice and preservice trainers. A companion purpose is to provide the field with a workable model by defining and performing a set of reciprocal tasks that illustrate the concept of dissemination in terms of:

- Exchange
- Awareness
- Knowledge
- Skill

The project's goals are similar to the objectives of this chapter: (1) to outline the services and products we offer to the training profession, (2) to describe these as interlocking levels of activity and, thus, (3) to translate dissemination into concrete terms that others might use for their own purposes.

The first level of activity, exchange, represents continuously identifying and reaching out to individuals and groups whose interests are similar to those of the project. Successful programs do not operate in isolation. In fact, any program may be regarded as the *actualization* of all of the resources available to it and, simultaneously, as a *potential* that can help other programs to become actualized. The fundamental step in achieving this pivotal position is an exchange system that will lead to contacts, liaisons, and interactions with all possible users and resources.

Within this project, exchange has included:

- The identification of approximately 3000 target users of training information and resources that this project, as well as training programs, might employ. These include: college and university departments; state education agencies; state directors of special education; personnel of regional resource centers; state facilitators of the National Diffusion Network; dissemination representatives of the Council of Chief State School Officers; organizations related to the goals of special education and personnel preparation; national dissemination activities, networks, and agencies; Congressional subcommittees involved in the funding of training programs; publishers and commercial developers; and a variety of individuals and groups who have made contact with us.

Dissemination may be defined as a set of interlocking tasks.

Exchange means liaisons, contacts, and interactions with all possible users and resources.

- An ongoing assessment that incorporates individual user comments in order to develop and distribute resource information that best answers the most predominant questions and needs.

- A modest information clearinghouse operated on a personalized basis. Through this service, potential users of information, who make inquiries about specific topics, receive personal letters or telephone calls that put them in touch with resources that may provide answers.

- Contact with various national and state organizations so as to collaborate with them at points of mutual interest and to make use of their print media and conference vehicles as resources for distributing information about training programs and about this project and, thereby, to reach more users.

- Liaison with dissemination activities sponsored by various agencies of the federal government in an effort to introduce both training programs and special education into national information and diffusion networks and to users in the field.

- The identification of major inservice and preservice training needs on a state-by-state basis, so that users of training programs and products may be linked with potential sources of the training they seek.

- Liaison with contractors of the Marketing Unit of the Bureau of Education for the Handicapped, and productive relationships with publishers and producers of educational materials, who can act as developmental and commercial resources for trainers, and as links to users in the field.

These exchange activities are the groundwork for all other project activities. First, they provide us with users, audiences, and participants. Second, they lead to decisions as to the kinds of information that should be disseminated. Third, they provide vehicles for presenting information. Fourth, exchange activities become greater than the sum of their parts; they form a unified process of give and take, judgment and action, stimulus and response, forming the matrix from which programs may grow.

At the second level, awareness, we are concerned with supplying general information about training programs to both users and resources. To do so, we retrieve information on categories of professional preparation programs, develop a variety of print materials on these topics, and send these materials three to four times a year as a large package. The most extensive documents in these packages are the consumer's guides to personnel preparation, so called because they provide a means for users to compare various aspects of large numbers of programs. Already in distribution are guides on the training of paraprofessionals,³¹ and on the inservice training of regular educators in special education, combined with a survey of inservice training in special education by state education agencies,^{32,33} and on the training of professionals in vocational education for the handicapped.³⁴ The project has also produced a book describing tasks and structures involved in classroom programming and personnel preparation in arts for the handicapped.³⁵ In press are consumer's guides to personnel preparation in physical education for the handicapped and on the training of professionals to work with low-incidence populations of handicapped children.

In addition to consumer's guides of approximately 100 pages, the awareness level includes:

- Short directories that list, without narrative, specified groups of projects

Exchange activities become greater than the sum of their parts; they form a unified process of give and take, judgment and action, stimulus and response.

The awareness level is concerned with supplying general information.

and complete information on how to contact their directors, e.g., a list of special projects funded by the Division of Personnel Preparation, a list of technical assistance systems supported by the Bureau of Education for the Handicapped.

- Lists of dissemination resources useful to professional preparation programs.
- Data displays showing training activities on a state-by-state basis.
- The publication of *Forum*, individual position papers on topics pertinent to professional preparation, with replies from professionals in the field.
- Brief news sheets and announcements concerning training programs and dissemination activities.
- Analyses of small groups of selected projects supported by the Division of Personnel Preparation.
- Short lists of questions posed by professionals in the field, so that others may call or write to them to provide the requested assistance.

Two things remain to be said about this project's work at the awareness level. First, although consumer's guides and other publications will always include projects funded by the Division of Personnel Preparation, our scope is not limited to dissemination of federally funded programs. Rather, our publications are attempts to portray the state of the art in various categories of professional preparation. Therefore, we make every effort to locate and include programs that do not receive federal funds. Much of this identification occurs at the exchange level, through contacts with organizations and clearinghouses, and we also welcome individual program descriptions sent by training personnel in the field. Second, we establish our topics according to the professional needs we are able to determine and, again, individual opinion can help to dictate our future directions.

The knowledge level is the third stratum of dissemination. Here the objective is to provide avenues whereby people may learn, gain insights, and contribute to the production of materials and stimulation of processes important to the enhancement of professional preparation. The knowledge level includes the preparation of articles and full-length publications, conference presentations, workshops, faculty and student seminars, and specially arranged miniconferences. Project personnel may author or present information, may encourage or assist others in doing so, and may collaborate with other groups which are producing knowledge for the field.

Categorical information gathered for publications at the awareness level is given additional depth at the knowledge level through adaptation to journal articles and other publications that will reach extended segments of the special education field. Thus, to complement the consumer's guide on the training of paraprofessionals, an article on that subject was published,³⁶ and, in conjunction with the consumer's guide on inservice training, another article was written.³⁷ This project will also produce a series of articles on dissemination, the first of which will appear in the *Review of the American Association for the Education of the Severely/Profoundly Handicapped*.³⁸ In addition, there has been collaboration between that Association and this project in the production of a full-length document on the preparation of personnel to serve the severely and profoundly handicapped.³⁹ Members of the project staff are currently

Our publications are attempts to portray the state of the art and, thus, we welcome program information and the expression of needs from all professionals.

At the knowledge level, project personnel may author or present information, may encourage or assist others in doing so, and may collaborate with other groups which are producing knowledge for the field.

collaborating with other individuals and groups on publications and materials relevant to professional preparation.

Conference presentations center largely on making a wide range of professionals aware of dissemination practices and resources and, toward that end, an audio-visual presentation has been completed, with funding from the BEH Division of Media Services. Project personnel also participate with other professionals in presenting insights into the state of the art and current needs in various areas of professional preparation. On a more personalized level, staff members visit training sites and discuss specific dissemination designs with faculty and staff, and also present seminars on dissemination to student groups. Another objective is to sponsor a small, task-oriented conference of teacher trainers who would commit themselves as a group to the development of some of the products, programs, or processes they see as needed in their area of special education. This conference, held in November 1978, involved the identification of approximately 30 professionals who participated in advance to determine key areas that need development, attended the conference for the specific purpose of working in small groups to begin plans for developing such products and processes, and will take this development work to completion as a task force.

The skill level represents the transfer of exemplary programs to meet inservice or preservice needs.

The final dissemination level, skill, represents efforts to transfer exemplary programs or their components to meet inservice and preservice needs that have been identified at the exchange level. Here the determination of excellence rests with data that will show that programs do, in fact, work. Also important are issues of practicality, cost effectiveness, transportability, and marketability in meeting established training needs.

Although this project is not directly involved in validation per se, we are continuously seeking and identifying programs whose data might lead to validation or verification. We also offer assistance to such programs in the development of data-gathering designs, displays, and presentations. When programs are thus determined to be exemplary, this project offers a number of middleman services to help program personnel to apply for replication funds, structure their programs for transfer, develop and package materials, identify markets for their programs, and contact resources and users. The best way to proceed with dissemination, validation or verification, and replication is to start at the beginning of the program, not at its conclusion. Therefore, we also offer long-term assistance to training programs in creating dissemination designs and initiating data collection

For you who are involved in preparing personnel, dissemination represents yet another undertaking in an already heavy schedule, and no one knows better than you that it is a difficult undertaking indeed.

This project's work, as outlined above, is *in support* of personnel preparation programs in universities and education agencies, whose mission is to prepare professionals to serve handicapped children. For those who are involved in this work, dissemination represents yet another undertaking in an already heavy schedule, and it is a difficult undertaking indeed. Dissemination involving massive preservice programs, and even smaller inservice programs, is not nearly as clearcut as the dissemination of a product or of a classroom practice. Moreover, although many enterprises dealing in services have dollars to pay for production, sales, and reaching the consumer, teacher training has not had that kind of money. In addition, there are manpower concerns about diverting professional energies from the main task of training personnel, particularly when those energies are already spread quite far on that task alone.

However, the need for verification, replication, and dissemination of training programs and materials becomes more pressing every day. Funding is not plentiful; it is not feasible for people to develop new programs from ground zero when so much has already been created. The Congress is actively seeking to find out how much of this research and development work is being spread across the field for the benefit of other trainers, trainees, and, ultimately, children. And there are, and will be for years to come, vast inservice needs in special and regular education. Finally, the dissemination networks operating in each state, under the auspices of the U.S. Office of Education and the National Institute of Education, are becoming more and more cognizant of Public Law 94-142 and the needs and demands for training in their localities. Many of them will need to integrate training programs and materials into their systems.

Certain training materials are already in great demand because they are quite useful. However, due to shortages of human and monetary resources, they often remain with the developer, instead of being supplied to the consumer. The other side of the coin is that, in far too many instances, fairly large numbers of people in different locations are developing the same products for their separate programs, with no plan to share them with each other or with anyone else. Thus, it is probably time to find a mechanism that would bring these developers together to produce one master package that could be distributed across the boards.

We are being told in subtle and not so subtle ways that dissemination needs to be a concern of personnel preparation. Yet we can scarcely keep up with all of the changes in the field and with the legislative requirements that must be met. On the other hand, shared information and experiences, programs we could borrow from or adapt to our needs, would in the long run alleviate some of the pressure and make this work easier. And, fortunately, the solutions to some of the obstacles are beginning to emerge.

There are various levels and extensions of dissemination. Some programs should clearly go all the way to national replication, while others would be suitably disseminating if they were able to make their companion programs aware of their activities and to share ideas and materials. But none of it will be easy, nor do we have a ready-made formula to apply en masse to all projects and programs. What we can do is work with you individually on the dissemination of your own programs, and that is what we will do if you want us to.

There is no formula that can be applied en masse to all programs and projects.

Teacher Education/Special Education EAST
203 Yoakum Parkway/Suite 1014
Alexandria, Virginia 22304

Teacher Education/Special Education WEST
Department of Special Education/College of Education
University of New Mexico
Albuquerque, New Mexico 87131

³¹Smith, J., Schafbuch, L., Klein, E., Moffett, M., Adamson, G., & Griffin, G. *A consumer's guide to personnel preparation: The training of paraprofessionals in special education and related fields*. Chicago: Instructional Dynamics, Inc., 1978.

³²Adamson, G., Griffin, G., Clelland, R., Panko, K., Smith, J., Tricarico, B., Clement, S., & Hart, V. *Inservice programming and Public Law 94-142: Part I. The inservice training of regular educators in special education*. Chicago: Instructional Dynamics, Inc., 1978.



³³Klein, E., Howell, R., & Smith, J. *Inservice programming and Public Law 94-142: Part II. Inservice training in special education by state education agencies*. Chicago: Instructional Dynamics, Inc., 1978.

³⁴Griffin, G., Clelland, R., Pynn, M., Smith, J., & Adamson, G. *The training of professionals in vocational education for the handicapped*. Chicago: Instructional Dynamics, Inc., 1978.

³⁵Smith, J., & Perks, W. *Humanism and the arts in special education*. Albuquerque: Teacher Education/Special Education, University of New Mexico, 1978 (second printing by The National Committee* Arts for the Handicapped, Washington, D.C., 1978).

³⁶Moore, E. The education of the paraprofessional. *Education and Training of the Mentally Retarded*, 12(3), September, 1977.

³⁷Smith, J., & Siantz, J. Inservice teacher education: Second thoughts from four sources. *Education and Training of the Mentally Retarded*, 13(2), April, 1978, 247-252.

³⁸Conversations on producing and using knowledge. *American Association for the Education of the Severely/Profoundly Handicapped Review* (in press).

³⁹Perske, R., & Smith, J. (Eds.). *Beyond the ordinary: The preparation of professionals to educate severely and profoundly handicapped persons—Toward the development of standards and criteria*. New York: Random House, 1977. (Distributed by the American Association for the Education of the Severely/Profoundly Handicapped)

CURRENT PROCEDURES AND ISSUES IN GRANT ADMINISTRATION



HERMAN SAETTLER

Chief

Western Region and Special Projects Branch

Division of Personnel Preparation

Bureau of Education for the Handicapped

CERTAIN ISSUES and concerns relate to the administration of the Division of Personnel Preparation's grant program. An understanding of these points by professionals in the field will not only assist them in the proper execution of proposals and funded projects, but will also assist Division personnel in the processing, review, and approval of applications. Although the proposal packet contains detailed instructions for completing the forms involved, there are some questions that arise repeatedly, as well as some mutual concerns about specific parts of the proposal format. These can best be answered in this chapter by addressing the major areas of concern that follow.

An understanding of points related to the Division's administrative policies will assist professionals in the execution of proposals and funded projects.

1. General guidelines for preparing applications. You may request an application packet that includes instructions, forms, priority statements, and other details from the:

Division of Personnel Preparation
Bureau of Education for the Handicapped
U.S. Office of Education
400 Maryland Avenue, SW (Donohoe Building)
Washington, D.C. 20202

New application packets are prepared each year, several months in advance of deadlines for submitting applications, which usually occur in the fall. For fiscal 1979 awards, the deadline for submission of non-competing continuation applications was October 10, 1978, and the new application deadline was October 24, 1978.

The "Dear Colleague" letter from the Division Director is part of each application packet, and you should read this letter very carefully and thoughtfully before beginning your application. With the packet, we also provide the actual evaluation form that will be used by reviewers of your application. The review items on this form may be used as a guide for structuring your proposal, and many people have found it helpful to ask a colleague to review the draft proposal with the evaluation form in hand before a final draft is submitted.

Your application should be easily read and referenced. In a document of any size, a table of contents is particularly important, and cross-referencing can also be a good idea. A good ground rule is to state the proposed activities three times: in the table of contents, in the narrative and in the budget. Clarity is essential to the narrative. Some applicants have had problems because they clung to a certain format (possibly borrowed from an approved proposal) which

New applications should document needs; continuation applications should document progress.

did not lend itself to their own narratives. Thus, another ground rule that applies to all writing is: form follows content. A further factor that has hurt some applications is the quality of the writing. When this interferes with the communication of activities and procedures, reviews will be unfavorable. During the review process, we cannot ask applicants to clarify their proposals. Thus, as a third ground rule, use plain good English.

One of the greatest weaknesses of new applications is the failure to present a strong statement of documented needs. Moreover, new applications are presented without a history of project performance, but they should include other sorts of historical information. It is not necessary to present the history of your institution and its founding fathers, but reviewers are interested in knowing that you have a faculty or staff of a certain size that has existed in the university or agency for a certain number of years and has trained a certain number of students. There should be a sound statement of credentials.

In reviewing continuation applications, we do look for a history of project performance. A continuation application should not simply restate activities projected for the first year; rather, it should explain progress. By the time an applicant submits for a third year, considerable progress should be reported. During the continuation years, review judgments are intimately related to the progress that a project is making in meeting its overall objectives.

2. The comprehensive system of personnel development. The Division of Personnel Preparation has joint responsibility with the BEH Division of Assistance to States in the implementation of the comprehensive system of personnel development as outlined in the Public Law 94-142 regulations.⁴¹ It cannot be stressed too strongly that each state's applicants must attend to the implementation of the system. As an applicant, it is your responsibility to be fully aware of the language of your state's comprehensive system of personnel development as submitted to BEH in the annual program plan required for your state's participation in funds provided through Public Law 94-142. Applications should reflect the state's or region's needs as set forth in the annual program plan.

3. Grant administration. Three essential aspects of grant administration are represented by three grant managers. Your project officer at the Bureau of Education for the Handicapped is responsible for monitoring the technical progress of your grant activities, and for providing the assistance you may need regarding the programmatic aspects of your project. Your grants officer at the Grant and Procurement Management Division is the person who actually obligates federal funds. The grants negotiator and the the grants officer can provide you with assistance in determining allowable costs and in meeting other requirements that are set forth in the terms and conditions expressed in the Code of Federal Regulations, Part 100.⁴⁰ Grants officers are located at:

Handicapped Personnel Preparation Program 13.451
Grant and Procurement Management Division
U.S. Office of Education
400 Maryland Avenue, SW (Room 5662-ROB 3)
Washington, D.C. 20202

The project director is the person who has the responsibility of carrying out the project for the grantee. Officially, the person authorized to sign the application will be the person ultimately responsible for the receipt, the custody, and the disbursement of federal funds. Usually, however, the project director is the person who has been delegated the responsibility for signing

requisitions and for verifying that work is being performed in accordance with the proposal and any amendments that have been submitted and approved. The project director is also responsible for knowing what is contained in the terms and conditions of the grant. In the case of an audit, the project director is the initial contact for verification and justification of the use of grant monies.

4. Non-competing vs. new competing applications. The Division of Personnel Preparation funds two types of grant applications: non-competing continuations and new competing applications. The Grant Award Notification indicates whether the grant is in the first, second, or final budget period. In the past, grantees with non-competing continuations have been able to submit new subcomponents for funding consideration, along with the previously approved subcomponents. Beginning with fiscal 1978-79, this policy was discontinued. In other words, non-competing continuation grantees are able to apply only for those subcomponents that were approved the previous year, and for funds within the range previously approved.

Grantees with noncompeting continuations may apply only for those subcomponents that were approved the previous year, and for funds within the range previously approved.

If an agency has a non-competing application and wishes to apply for funds to support new or additional activities, it must submit a separate application for those activities, and that application will be considered as a new competing application. If a grantee uses a non-competing application to request funds for new activities not previously approved, these activities will be disapproved as inappropriate for a non-competing continuation application. A non-competing grantee should anticipate a decrease in fiscal 1979 funds commensurate with any fiscal 1978 one-year-only funds.

New applicants should consult Tables 11 and 12 for information as to the grant cycle of their states. Using fiscal 1979 as an example, Table 11 shows that applicants in X states should submit new applications; applicants in Y states would be in the third year of a state's grant cycle; and Z state applicants would be in the second year.

5. Details related to grant application. The face sheet of the proposal packet (Standard Form 424 of OE Forms 9037 and 9047), as shown on Figure 2, was designed by the Office of Management and Budget to collect information, some of which is quite important to the Division of Personnel Preparation. In order that proposals may show this information clearly, a few details are necessary beyond the instructions presented in the proposal package.

- Item 4h. The fourth section of the face sheet concerns information that the Division uses to contact project personnel. Thus, in item 4h, it is essential that the name of the project director or principal investigator be entered. The name of the certifying representative should *not* appear here, but should be shown in item 23. If the correct person is not identified in item 4h, then the correct name will not appear on the Division's computerized mailing list and correspondence will not be properly directed.

- Item 7. The Division receives approximately 1400 proposals each year, and these are processed by the Application Control Center, which transfers them to tracks that account for expenditures. Those tracks are directly related to the information presented in item 7 and, in many cases, the various project titles submitted from the field have created difficulties in determining where proposals fit into budget categories. Therefore, in item 7, the first words that appear should define the type of proposal in one of the following specific terms:

- Special Project
- Program Assistance Grant
- Regular Education Preservice
- Regular Education Inservice
- Doctoral Program, Visually Handicapped
- Doctoral Program, Hearing Impaired

Projects may, of course, devise their own descriptive titles, but these should be written in parentheses after one of the above titles has been entered.

The actual proposal form is composed of a set of tables: OE Form 9047 for colleges and universities, and a similar OE Form 9037 for state and local governments. Tables 1 and 2 of OE Form 9047 are to be completed only for new grant applications and not for continuation grants, unless a change of emphasis or modification needs to be reported. When preparing a grant application, the most logical way to proceed is to prepare Table 1, then Table 2, then the budget categories and summary, and finally Table 3. (See Figures 3 through 7.)

The Division's budget from Congress is divided into categories that must be specified by applicants.

The first table, the Preparation Program Profile (shown as Figure 3), establishes major components and subcomponents and thereby sets up the framework of the total program. The more subcomponents, the more complex the program and the greater the responsibility—and the more difficult the completion of the application. Column d of this table is of exceeding importance to the Division, because it indicates the priority (e.g., general special education, early childhood education, paraprofessionals, and so forth) that the program addresses. The Division's budget from Congress is divided into categories of funding that must be specified by applicants and by the Bureau. In the proposal packet, these categories are listed on the reverse of Table 1. Applicants may respond to more than one category. For example, an early childhood training program might concentrate on the severely handicapped, thus answering two priorities, or a program might address both vocational education and the training of parents. In any event, column d must specifically include one or more of these priority categories.

The second table, Preparation Program Staff Profile (as shown on Figure 4), shows the assignments of personnel to implement each subcomponent established in Table 1. Thus, there should be a clear relationship between these two tables. Budget information appears on two sheets: Section A: Budget, and Section B: Budget Summary. On these forms, the components shown on Table 1 and the personnel listed on Table 2 are cost analyzed.

Accurate reporting of project graduates will prevent the perpetuation of teacher surpluses.

The third table, Report of Project Graduates for Academic Year (as shown on Figure 5), is crucial to the Division because it displays numbers of students graduated and their job placement. In view of the emphasis on manpower planning, as well as continuing news about teacher surpluses, we need to know how many people are being prepared in each priority area, so as to cut back where surpluses are really occurring.

All remaining items on the face sheet and proposal form must, of course, be completed, and a narrative must be written. The foregoing information has pointed out those areas that need particularly careful attention from proposal writers to ensure that applications can be processed.

6. Your grant number. When your application is received, it is assigned a project number which always begins with the digits 451. This number follows your application from the time it comes in until you are issued an award. Once you receive an award, all documents are referenced by a new number, the grant

number. On all correspondence and submission of documents, *you must include your grant number*, which starts with the letters GOO and can be found in cell 6 of your grant document. When final or fiscal reports are submitted without a grant number, they cannot be credited to the project that submitted them.

7. Budget and budget revision. The budget you prepare should refer to each component or subcomponent in the application. Your budget should also contain justification statements as to *why* the funds are necessary to each line item.

Federal funds authorized to carry out the objectives of a proposal are specifically for that purpose and, unless the objectives are amended, that is the only way they can be spent. Accordingly, the grantee must maintain accounts, records, and other evidence pertaining to all costs incurred. Expenditures may be charged to the grant only if they are in payment of an obligation incurred during the grant period and conform to the approved project proposal. There can be no co-mingling of funds nor transfer of funds from one grant project to another.

The Division receives many questions about the procedures for making budget revisions and minor deviations in grants. The regulations^{42,43} outline two different sets of procedures, the first pertaining only to state and local government grantees, paragraph 100a.29(a), and the second pertaining to all other grantees, paragraph 100a.29(b). Both sets of procedures spell out three instances which require prior approval of changes by all grantees:

- No funds may be moved into a budget line item which had not previously been a budget line item approved for the grant by the U. S. Office of Education.
- Even though the line item "equipment" may have been previously approved, each piece of equipment has to be approved by the U. S. Office of Education before purchase.
- No foreign travel is authorized under the grant unless prior approval is received from the grants officer. (Travel between the United States and Guam, American Samoa, Puerto Rico, the U. S. Virgin Islands, the Canal Zone, the Trust Territories, and Canada is not considered foreign travel.)

Certain other procedures apply specifically to state and local government recipients of grants. For non-construction grants and contracts, state and local governments must promptly request prior approval for budget revisions from the Commissioner of Education whenever:

- The revision results from changes in the scope of the objectives of the project;
- The revision indicates the need for additional federal funding;
- The budget is over \$100,000 and the cumulative amount of transfers among direct cost object class categories (budget line items) exceeds or is expected to exceed \$10,000, or 5 percent of the budget, whichever is greater. The same criteria apply to the cumulative amount of transfers among projects, functions, and activities when budgeted separately for a grant or contract, except that no transfer is permissible which would cause any federal appropriation, or part thereof, to be used for purposes other than those intended;
- The budget is \$100,000 or less, and the cumulative amount of transfers

Procedures for making budget revisions and minor deviations in grants vary according to the recipient of the grant.

State and local government grantees must use specific procedures for budget revision.

among direct cost object class categories (budget line items) exceeds or is expected to exceed 5 percent of the budget. The same criteria apply to the cumulative amount of transfers among projects, functions, and activities when budgeted separately for a grant or contract, except that no transfer is permissible which would cause any federal appropriation or part thereof, to be used for purposes other than those intended;

- The revisions involve the transfer of amounts budgeted for indirect costs to absorb increases in direct costs; or
- The revisions pertain to the addition of items requiring prior approval in accordance with the provisions of Appendix B of the General Provisions.⁴⁴

Budget revisions by state or local government grantees which do not require approval by the Commissioner include:

- The use of the recipient's own funds in furtherance of project objectives over and above the recipient minimum share (if any) included in the approved budget.
- The transfer of amounts budgeted for direct costs to absorb authorized increases in indirect costs.

Colleges, universities, and other non-profit agencies follow a different set of procedures.

When the recipient of a grant is other than a state or local government (i.e., college, university, other nonprofit agency), minor deviations are permitted without an approved amendment or revision when:

- They do not result in expenditures in excess of the total amount granted.
- There is not any material change in the content or administration of the approved project.
- Expenditures are otherwise made in accordance with, and for kinds of expenditures authorized in, the approved application.

When permission is required, under either set of procedures, to make a budget revision or minor deviation, a letter of request signed by the certifying representative and the project director must be sent to the appropriate Division project officer for processing. The request should be sent at least 30 days before the change is to be made, and the letter should indicate the project number, the grant number, the originally approved line item budget, the proposed line item budget, and a justification of the proposed change. Letters requesting a budget revision should be addressed to the grants officer. A final decision on the request for change will be issued by the Grant and Procurement Division of the U.S. Office of Education.

Major personnel changes, and accompanying program changes, must be reported in detail.

8. Changes in key personnel. The *Federal Register* indicates what is required of grantees when there is a change in key personnel, as follows:

If for any reason it becomes necessary to substitute the project director or other key professional staff designated in the grant or contract, the recipient shall provide timely written notification to the Commissioner of the substitution. Such written notification shall include the name and qualifications of the successor.⁴⁵

If program changes result from changes in key personnel, these should also be explained in a concise narrative.

The letter indicating a personnel change should be signed by the certifying representative and project director and sent to the grants officer. The letter should indicate the project number, grant number, the names of the key person or persons leaving, and the name of replacements with a vita for each.

9. Carry-over. Carry-over occurs when activities that could not be completed during one budget period are moved into the next budget period, with an accompanying carry-over of funds to conduct those activities. Carry-over may move some activities from a first budget period to a second budget period, or from a second to a third budget period—but it may not be done at the end of a third or a final budget period. (This latter type of request is called a no-cost time extension.)

Carry-over means the transfer of some program activities from one budget period to the next, but not beyond the final budget period.

A grantee may submit a carry-over request up to 90 days following the end of the budget period. In that case, however, Division staff would probably recommend approval of the carry-over with a deletion of a like amount of funding for the current grant. Ideally, to process such a request in sufficient time, the Division should have the request by the first of March each year. The request itself should contain:

- A letter cosigned by the certifying representative and project director.
- A detailed outline of the activities that were not carried out, the reasons for their not being conducted, and a budget outline for the activities to be carried out and dates for their completion.
- Indication of the assigned project number and grant number.

This material should be sent to the grants officer. If the request is approved, a revised Notification of Grant Award will be issued to document the carry-over.

10. No-cost time extension. This type of extension may be requested by a grantee in the final budget period, and may be requested only to complete activities which could not be completed during the approval budget period. A carry-over of funds may be associated with those activities.

A no-cost time extension transfers some program activities beyond the final budget period.

Requests for no-cost time extensions must be received by the grants officer by March 1 of the final budget period. If a request is submitted later, the grantee runs the risk of not receiving approval in time to conduct the activities. The request must contain:

- A letter cosigned by the certifying representative and the project director.
- A description of activities to be carried out, with reasons as to why they could not be carried out during the approved budget period.
- Proposed budget and time lines for completion.
- The project number and grant number.

The letter should be sent to the grants officer. The procedures for review and recommendation are the same as those for carry-over of funds.

11. Products developed with federal funds. Although most projects funded by the Division of Personnel Preparation concern training as their major focus, many develop training materials and other products in the accomplishment of their stated objectives. All printing and duplicating authorized under a grant are subject to the limitations and restrictions contained in the current issue of the U.S. Government Printing and Binding Regulations—if the printing or duplicating is done for the U.S. Office of Education within the meaning of these regulations. You should direct inquiries regarding printing to your grants officer in the Grant and Procurement Management Division, and questions concerning copyrights may also be directed to that individual.

If you anticipate spending grant funds for the development and production of audiovisual materials (such as motion picture films, videotapes, filmstrips, slide sets, tape recordings, and the like), you need to set forth in your proposal enough detailed information to enable your project officer to obtain a clearance

from the audiovisual clearance officer. The clearance form is internal and is not sent into the field for you to fill out, but you need to provide proposal details such as type, length, content, cost, and other production factors involved.

From time to time, a product developed by a training project shows promise of great usefulness to the entire field.

From time to time, a product developed by a training project shows promise of great usefulness to the entire field. When this occurs, the product can be submitted to the BEH Marketing Unit for disposition in one of three ways: commercial marketing through the Marketing Unit's linkage contractor; placement in the Marketing Unit's distribution system for dissemination; entry into the catalog of BEH funded products. All of these systems are designed to make useful products and materials available to those who need them in the field. Your contact in regard to product submissions should be your project officer.

12. Stipends. A problem that constantly arises both in review of applications and in project officers' discussions with faculty and students of training programs is that no one seems to know the policy used in awarding stipends and in determining stipend amounts. Therefore, each grantee who plans to award stipends must describe in his application, and must make public to faculty and students, the policy regarding selecting of stipend recipients and the policy used for determining the amount of stipends.

A number of sources of student assistance are available outside the Bureau of Education for the Handicapped.

The Division of Personnel Preparation will be decreasing its emphasis on stipends, particularly at the undergraduate level, in response to both Congress and the Administration. Undergraduates are eligible for at least five major financial aid programs of the U.S. Office of Education:

- Basic Educational Opportunity Grant Program
- National Direct Student Loan Program
- Supplemental Educational Opportunity Grant
- College Work Study Program
- Guaranteed Student Loan Program

These programs are described in a booklet entitled "HEW Fact Sheet: Five Federal Financial Aid Program."⁴⁶

Any request for stipends on a grant application to the Division of Personnel Preparation must be fully documented as to need. If a program is specifically designed to meet a recognized regional need and is funded by the Division for that purpose (for example, training programs in the area of the visually handicapped), then stipends may be necessary to assist in the payment of out-of-state tuition. However, even that kind of need must be fully documented.

13. Regulations for Section 504 of Public Law 93-112. Section 504 of the Rehabilitation Act of 1973 states that:

No otherwise qualified handicapped individual . . . shall, solely by the reason of his/her handicap, be excluded from the participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.⁴⁷

A number of guides to the implementation of Section 504 are being developed.

The Office for Civil Rights has the primary responsibility for enforcing Section 504 regulations. In the near future, the Office for Civil Rights will develop or cause to be developed a number of products that will serve as guides for the implementation of Section 504, including:

- Preschool, elementary, secondary, and post-secondary education self-evaluation instruments to be used by the educational institution to focus their attention on the major programs which may need remedial attention as a result of Section 504.

- A post-secondary admissions policy review instrument, covering such areas as testing, recruitment, quotas, pre-admission inquiries, admissions criteria, and so on.
- An elementary and secondary education personnel resource directory, which will identify the training resources that elementary and secondary educational institutions may utilize to learn techniques for educating handicapped students.
- An employment self-evaluation instrument, addressing employment practices.
- A system for facilitating program accessibility in higher education: A computerized system and a derivative manual system for enabling institutions with limited accessible space to accommodate students with impaired mobility.

As part of all applications to the Office of Education, we must now have the assurance of compliance with Section 504 of the Rehabilitation Act of 1973, as amended. Sections 502 and 503 of this Act are also of interest to professionals involved in personnel preparation. Section 502 requires the elimination of architectural barriers that would make buildings inaccessible to the handicapped, and also creates the Architectural and Transportation Barriers Compliance Board. Section 503 states that any federal contractor whose contract exceeds \$2,500 must take affirmative action to employ the handicapped.

Section 504 itself will have a direct effect on training programs in terms of recruitment. Many professionals have developed recruitment literature that is unique to their programs. The regulations indicate that, if a recipient of federal funds publishes or uses recruitment materials or publications containing information made available to participants, beneficiaries, applicants, or employees, it shall include in those materials a statement that the agency does not discriminate on the basis of handicap in admission, access to, treatment in, or employment in its programs or activities.

Moreover, recipients must operate programs or activities in such a manner that, when viewed in their entirety, they are readily accessible to handicapped persons. This does not mean that recipients must make each facility or every part of a facility accessible to and usable by handicapped persons. Compliance may be accomplished by redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternative accessible sites, alteration of existing facilities, and construction of new facilities in conformance with the requirements—or any other method that results in making the program accessible. In selecting a method for complying, a recipient must give priority to the methods that offer programs and activities to handicapped persons in the most integrated appropriate setting. These requirements also apply to the renting or leasing of facilities, a particularly important consideration to those who may rent the use of educational facilities, hotels, motels, and the like to conduct inservice training and workshops. Further information on this topic may be found in a booklet entitled *Barrier Free Meetings: A Guide for Professional Associations*.⁴⁸ (Specific questions concerning your program or agency in relation to Section 504 may be directed to your Regional Director for Civil Rights. Table 13 contains a list of these Regional Directors.)

Compliance with Section 504 must be based on methods that offer programs and activities to handicapped persons in the most integrated appropriate setting.

In 1973, we said in our application packet that, as advocates for the handicapped, it would seem proper for all of us to review the various programs and activities in which we are engaged in order to: (1) initiate the development of resources, including personnel and environmental, and (2) make pro-

grammatic changes so as to be in compliance with Section 504 of the Rehabilitation Act of 1973. Today we must exert even more influence as advocates within our own institutions to bring about compliance.

One of the Division's evaluation criteria is a description of the extent to which present and former students, employing agencies (school districts, state agencies, and the like), and individuals (parents, practicing teachers, and others) are involved in program planning, implementation, and evaluation. We must have the active involvement of handicapped individuals in this work, as well. We need to plan, too, for greater use of parents, particularly parents of handicapped individuals, throughout the training program.

*For too long, the able
bodied have taught
able-bodied teacher
trainers to train
able-bodied students to
teach persons who have
handicaps.*

As advocates, we should engage in active recruitment of persons who have handicaps so that they may become part of our training programs. For too long the able bodied have taught able-bodied teacher trainers to train able-bodied students to teach persons who have handicaps. Many handicapped individuals have already entered the field as professionals, with great success. While we continue to encourage their sensitive participation, we must also assure that our training sites are conducive to their entry into our programs.

⁴⁰ *Federal Register*, 38(213), Tuesday, November 6, 1973.

⁴¹ Department of Health, Education, and Welfare, Office of Education. Education of handicapped children: Implementatino of Part B of the Education of the Handicapped Act. *Federal Register*, 42(163), Tuesday, August 23, 1977, Part II (Sections 121a.380 through 121a.387, pp. 42492 and 42493).

⁴² Part III. Administrative and fiscal requirements. *Federal Register*, 38(213), Tuesday, November 6, 1973.

⁴³ *Code of federal regulations*. 45 CFR. Public welfare, Parts 100-199, Chapter 1. Washington, D. C: Department of Health, Education, and Welfare, Office of Education, 1976. (A bound copy of current regulations relating to grants and contracts may be purchased for \$10.00 from the Superintendent of Documents, U. S. Government Printing Office, Washington, D. C. 20402.)

⁴⁴ *Code of federal regulations*. 45 CFR. Public welfare, Parts 100-199, Chapter 1. Washington, D. C: Department of Health, Education, and Welfare, Office of Education, 1976.

⁴⁵ Part III. Administrative and fiscal requirements. *Federal Register*, 38 (213), Tuesday, November 6, 1973.

⁴⁶ HEW fact sheet: Five federal financial aid programs. Washington, D. C: Department of Health, Education, and Welfare. (Order from the Director, Guaranteed Student Loans, U. S. Office of Education, 400 Maryland Avenue, Southwest—ROB 4661, Washington, D. C. 20202.)

⁴⁷ Regulations for Section 504 of the Rehabilitation Act of 1973. *Federal Register*, 42 (86), May 4, 1977. (Order from David S. Tatel, Director, Office for Civil Rights, HEW Building North, 330 Independence Avenue, Southwest, Washington, D. C. 20005.)

⁴⁸ *Barrier-free meetings: A guide for professional associations*. Washington, D. C: American Association for the Advancement of Science, 1976. (Order from the Association, at 1515 Massachusetts Avenue, Northwest, Washington, D. C. 20202.)

TABLE 11

Explanation of Program Approval Cycles and Budget Periods

This information is designed to provide applicants with guidance pertaining to program approval cycles and budget periods. Programs may be approved for one, two, or three years, but budgets are approved on a yearly basis.

For example, for fiscal year 1979 (academic year 1979–80), programs within states designated as the X cycle would submit new applications. Programs in Y and Z states would submit continuation applications, unless they have not been funded during the previous year, or were funded for one year only. In this case, new applications would be required.

<i>Program Cycle</i>	<i>Current Status of Program Cycle</i>	<i>Budget Period</i>
<i>Fiscal Year 1978 (Academic Year 1978–79)</i>		
X	Third year of a three-year program	June 1, 1978—May 31, 1979
Y	Second year of a three-year program	June 1, 1978—May 31, 1979
Z	First year of a three-year program	June 1, 1978—May 31, 1979
<i>Fiscal Year 1979 (Academic Year 1979–80)</i>		
X	First year of a three-year program	June 1, 1979—May 31, 1980
Y	Third year of a three-year program	June 1, 1979—May 31, 1980
Z	Second year of a three-year program	June 1, 1979—May 31, 1980
<i>Fiscal Year 1980 (Academic Year 1980–81)</i>		
X	Second year of a three-year program	June 1, 1980—May 31, 1981
Y	First year of a three-year program	June 1, 1980—May 31, 1981
Z	Third year of a three-year program	June 1, 1980—May 31, 1981

NOTE CAREFULLY! For fiscal year 1979, applicants submitting *new* applications must submit them so that, if funded, they are on cycle. Any new application from an agency in a Y-cycle state should submit an application for one year only; an applicant from an agency in a Z-cycle state would submit an application for two years only. Only applicants in X-cycle states would submit applications for the regular three-year cycle. Your attention to this cycle is critical since the number of years to be considered will significantly affect the work scope planned.

TABLE 12
State-by-State Program Cycles

	Program Cycles		Program Cycles
1. Alabama	Z	29. Nevada	Z
2. Alaska	X	30. New Hampshire	Y
3. Arizona	Y	31. New Jersey	Y
4. Arkansas	Z	32. New Mexico	X
5. California	Y	33. New York	Y
6. Colorado	Y	34. North Carolina	Y
7. Connecticut	Z	35. North Dakota	Y
8. Delaware	Y	36. Ohio	Y
9. District of Columbia	Y	37. Oklahoma	X
10. Florida	X	38. Oregon	Y
11. Georgia	X	39. Pennsylvania	Z
12. Hawaii	Y	40. Rhode Island	Z
13. Idaho	Y	41. South Carolina	X
14. Illinois	X	42. South Dakota	X
15. Indiana	X	43. Tennessee	Z
16. Iowa	Y	44. Texas	Z
17. Kansas	Z	45. Utah	X
18. Kentucky	Z	46. Vermont	X
19. Louisiana	X	47. Virginia	Y
20. Maine	X	48. Washington	Z
21. Maryland	Z	49. West Virginia	X
22. Massachusetts	Z	50. Wisconsin	Z
23. Michigan	X	51. Wyoming	X
24. Minnesota	Z	52. American Samoa	Z
25. Mississippi	X	53. Guam	Y
26. Missouri	Z	54. Puerto Rico	X
27. Montana	Z	55. Trust Territory	Y
28. Nebraska	Z	56. Virgin Islands	X

FEDERAL ASSISTANCE		2. APPLICANT'S APPLICATION	a. NUMBER	3. STATE APPLICATION IDENTIFIER	a. NUMBER
1. TYPE OF ACTION <input type="checkbox"/> PREAPPLICATION <input type="checkbox"/> APPLICATION (Mark appropriate box) <input type="checkbox"/> NOTIFICATION OF INTENT (OpI) <input type="checkbox"/> REPORT OF FEDERAL ACTION		b. DATE Year month day 19		b. DATE Year month day ASSIGNED 19	
4. LEGAL APPLICANT/RECIPIENT a. Applicant Name : b. Organization Unit : c. Street/P.O. Box : d. City : e. County : f. State : g. ZIP Code : h. Contact Person (Name & telephone No.) :			5. FEDERAL EMPLOYER IDENTIFICATION NO. 6. PRO-GRAM (From Federal Catalog) a. NUMBER 1 3 4 5 1 b. TITLE Handicapped Personnel Preparation		
7. TITLE AND DESCRIPTION OF APPLICANT'S PROJECT			8. TYPE OF APPLICANT/RECIPIENT A-State H-Community Action Agency B-Interstate I-Higher Educational Institution C-Substate J-Indian Tribe D-District K-Other (Specify): E-City F-School District G-Special Purpose District Enter appropriate letter <input type="checkbox"/>		
10. AREA OF PROJECT IMPACT (Name of cities, counties, States, etc.)		11. ESTIMATED NUMBER OF PERSONS BENEFITING		12. TYPE OF APPLICATION A-New C-Rvision E-Augmentation B-Renewal D-Continuation Enter appropriate letter <input type="checkbox"/>	
13. PROPOSED FUNDING a. FEDERAL \$.00 b. APPLICANT .00 c. STATE .00 d. LOCAL .00 e. OTHER .00 f. TOTAL \$.00		14. CONGRESSIONAL DISTRICTS OF: a. APPLICANT b. PROJECT 16. PROJECT START DATE Year month day 19 17. PROJECT DURATION Months 18. ESTIMATED DATE TO BE SUBMITTED TO FEDERAL AGENCY Year month day 19		15. TYPE OF CHANGE (For 18c or 18e) A-Increase Dollars F-Other (Specify): B-Decrease Dollars C-Increase Duration D-Decrease Duration E-Cancellation Enter appropriate letter(s) <input type="checkbox"/>	
20. FEDERAL AGENCY TO RECEIVE REQUEST (Name, City, State, ZIP code) U.S. Office of Education, Application Control Center, Washington, D.C. 20202			21. REMARKS ADDED <input type="checkbox"/> Yes <input type="checkbox"/> No		
22. THE APPLICANT CERTIFIES THAT a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved. b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached: spouse Response attached (1) <input type="checkbox"/> <input type="checkbox"/> (2) <input type="checkbox"/> <input type="checkbox"/> (3) <input type="checkbox"/> <input type="checkbox"/>		23. CERTIFYING REPRESENTATIVE a. TYPED NAME AND TITLE b. SIGNATURE c. DATE SIGNED Year month day 19			
24. AGENCY NAME			25. APPLICATION RECEIVED 19		
26. ORGANIZATIONAL UNIT			28. FEDERAL APPLICATION IDENTIFICATION		
29. ADDRESS			30. FEDERAL GRANT IDENTIFICATION		
31. ACTION TAKEN <input type="checkbox"/> a. AWARDED <input type="checkbox"/> b. REJECTED <input type="checkbox"/> c. RETURNED FOR AMENDMENT <input type="checkbox"/> d. DEFERRED <input type="checkbox"/> e. WITHDRAWN		32. FUNDING a. FEDERAL \$.00 b. APPLICANT .00 c. STATE .00 d. LOCAL .00 e. OTHER .00 f. TOTAL \$.00		33. ACTION DATE Year month day 19 35. CONTACT FOR ADDITIONAL INFORMATION (Name and telephone number) 34. STARTING DATE Year month day 19 36. ENDING DATE Year month day 19 37. REMARKS ADDED <input type="checkbox"/> Yes <input type="checkbox"/> No	
38. FEDERAL AGENCY A-95 ACTION a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made. b. FEDERAL AGENCY A-95 OFFICIAL (Name and telephone no.)					

Figure 2. OE Form 9047. Standard Form 424.
(Face sheet of proposal package)

Figure 3. OE Form 9047
(Table 1. Preparation Program Profile)

Figure 4. OE Form 9047
(Table 2. Preparation Program Staff Profile)

TABLE 3. REPORT OF PROJECT GRADUATES FOR ACADEMIC YEAR _____															NAME OF APPLICANT _____					
(See reverse for Instructions)																				
PROJECT SUB-COMPONENTS-TITLE (a)	BEH TRAIN- ING CATE- GORY (b)	NO. OF STUDENTS GRADU- ATED (c)	NO. OF STUDENTS CERTI- FIED (d)	NUMBER OF STUDENTS PLACED IN EACH SETTING (e)														TOTAL (Students placed in education) (f)		
				SPECIAL EDUCATION																
				ECF	ECO	PSE	PSS	RSC	SOS	H/C	CAG	PPR	C/U	STA	01	02	GED	03	GENERAL	
1.0																				GRANT SUPPORTED
																				OTHER
2.0																				GRANT SUPPORTED
																				OTHER
3.0																				GRANT SUPPORTED
																				OTHER
4.0																				GRANT SUPPORTED
																				OTHER
5.0																				GRANT SUPPORTED
																				OTHER
6.0																				GRANT SUPPORTED
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7.0																				GRANT SUPPORTED
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9.0																				GRANT SUPPORTED
																				OTHER
10.0																				GRANT SUPPORTED
																				OTHER
01																				GRANT SUPPORTED
02																				OTHER
03																				GRANT SUPPORTED
																				OTHER

OE FORM 9047, 7/77

Figure 5. OE Form 9047
(Table 3. Report of Project Graduates for Academic Year)

SECTION A - BUDGET CATEGORIES						
PROJECT COMPONENT(S)	DEGREE PROGRAM(S), NON DEGREE OR CERTIFICATION PROGRAM(S); OTHER COMPONENT(S) (For these project components sequentially list the sub-components by title)					
	1.	2.	3.	4.	5.	6. TOTAL
Personnel	\$	\$	\$	\$	\$	\$
Fringe Benefits						
Travel						
Equipment						
Supplies						
Contractual						
Student Financial Assistance						
Consultants						
Other						
Total Direct Charges						
Indirect Charges (8% maximum)						
TOTAL	\$	\$	\$	\$	\$	\$

SECTION A EXPLANATIONS

Figure 6. OE Form 9047
(Section A. Budget Categories)

SECTION B - BUDGET SUMMARY					
PROJECT COMPONENT(S)	ESTIMATED UNOBLIGATED FUNDS		NEW OR REVISED BUDGET		
	FEDERAL (a)	NON-FEDERAL (b)	FEDERAL (c)	NON-FEDERAL (d)	TOTAL (e)
Degree Program(s)	\$	\$	\$	\$	\$
Non Degree or Certification Program(s)					
Other Component(s)					
TOTAL	\$	\$	\$	\$	\$

SECTION C - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
PROJECT COMPONENT(S)	FUTURE FUNDING PERIODS (Years)			
	FIRST (a)	SECOND (b)	THIRD (c)	TOTAL (d)
Degree Program(s)	\$	\$	\$	\$
Non Degree or Certification Program(s)				
Other Component(s)				
TOTAL	\$	\$	\$	\$

Figure 7. OE Form 9047
(Section B. Budget Summary)

TABLE 13
Regional Civil Rights Directors

	FTS Phone	Non-FTS Phone
REGION I— <i>Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont</i>		
Mr. John G. Bynoe Regional Director Office for Civil Rights, Region I Dept. of Health, Educ., and Welfare 140 Federal Street Boston, MA 02110	8-223-6397	617-223-6397
REGION II— <i>New Jersey, New York, Puerto Rico, Virgin Islands</i>		
Mr. William Valentine Acting, Regional Director Office for Civil Rights, Region II Dept. of Health, Educ., and Welfare 26 Federal Plaza—Room 3908 New York, NY 10007	8-264-4633	212-264-4633
REGION III— <i>Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, W. Virginia</i>		
Mr. Dewey E. Dodds Regional Director Office for Civil Rights, Region III Dept. of Health, Educ., and Welfare Gateway Building, 3535 Market Street Post Office Box 13716 Philadelphia, PA 19101	8-596-6772	215-596-6772
REGION IV— <i>Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee</i>		
Mr. William H. Thomas Regional Director Office for Civil Rights, Region IV Dept. of Health, Educ., and Welfare 680 W. Peachtree Street, N.W. Atlanta, GA 30308	8-257-3312	404-881-3312
REGION V— <i>Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin</i>		
Mr. Kenneth A. Mines Regional Director Office for Civil Rights, Region V Department of Health, Educ., and Welfare 300 South Wacker Drive Chicago, IL 60606	8-353-2520	312-353-2521
Cleveland Office Office for Civil Rights Dept. of Health, Educ., and Welfare Plaza Nine Building 55 Erieview Plaza—Room 222 Cleveland, OH 44114	8-293-4970	216-522-4970
REGION VI— <i>Arkansas, Louisiana, New Mexico, Oklahoma, Texas</i>		
Ms. Dorothy D. Stuck Regional Director Office for Civil Rights, Region VI Dept. of Health, Educ., and Welfare 1200 Main Tower Building Dallas, TX 75202	8-729-3951	214-655-3951

TABLE 13 (Continued)

	FTS Phone	Non-FTS Phone
REGION VII—Iowa, Kansas, Missouri, Nebraska		
Mr. Taylor D. August	8-758-2474	816-374-2474
Regional Director		
Office for Civil Rights, Region VII		
Dept. of Health, Educ., and Welfare		
Twelve Grand Building		
1150 Grand Avenue		
Kansas City, MO 64106		
REGION VIII—Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming		
Dr. Gilbert D. Roman	8-327-2025	303-837-2025
Regional Director		
Office for Civil Rights, Region VIII		
Dept. of Health, Educ., and Welfare		
Federal Building		
1961 Stout Street—Room 11037		
Denver, CO 80294		
REGION IX—Arizona, California, Hawaii, Nevada, Guam, Trust Territory of Pacific Islands, American Samoa		
Mr. Floyd L. Pierce	8-556-8586	415-556-8586
Regional Director		
Office for Civil Rights, Region IX		
Dept. of Health, Educ., and Welfare		
100 Van Ness Avenue—14th Floor		
San Francisco, CA 94102		
REGION X—Alaska, Idaho, Oregon, Washington		
Ms. Marlaina Kiner	8-399-0473	206-442-0473
Regional Director		
Office for Civil Rights, Region X		
Dept. of Health, Educ., and Welfare		
1321 Second Avenue—Room 5041 MS/508		
Seattle, WA 98101		

RESPONSES FROM THE PROFESSION

At each of the regional meetings that generated the information in this volume, three reactors represented the audience of professionals involved in personnel preparation. These individuals made notes on the proceedings, were available to individuals for comment and discussion, and held informal conversations. As receivers of information, they were also sensitive to underlying concerns and issues. At the conclusion of each regional meeting, each group of three reactors presented a summation of the conference and of the ideas and concerns they had derived in their interactions with attendees. This chapter presents those concluding comments.

JOSEPH T. GILMORE

New York State Education Department, Albany, New York

OUR KEY problem is the implementation of Public Law 94-142; this pervades all of our training efforts. The Bureau of Education for the Handicapped needs to hear from the field the recurring issues of greatest concern and, in turn, the Bureau should share all of this information with the field. We need to maintain a dialogue on the processes, problems, and prospects of implementing the law.

We have to solve the problems and keep them solved, for the sake of those children out there. We must continue to raise our own consciousness and to implement in reality all of the things implied by the Education of All Handicapped Children Act and by Section 504 of the Rehabilitation Act. If we ourselves are not advocates for the handicapped, their situation and our own will be quite tragic.

Many people tend to use the statutes and regulations as a club, to talk too much about sanctions and too little about collaboration—but collaboration is absolutely necessary if we are to meet the challenges of the complex forces of change that are upon us. The spirit generated must be one of understanding, acceptance, and commitment. We are only at the tip of the iceberg. As we proceed more intensely with intelligent, sensitive, and generous cooperation in the implementation of the law, a number of other needs will surface.

There is obviously a need to continue providing massive inservice training on the individualized educational program, and to clarify its timing and frequency and a host of related issues. Parents and advocate groups are going to want far more in terms of the individualized program, teachers and teachers' unions are going to want far less, and there will be contractual and accountability considerations in collective bargaining.

The provision for the least restrictive environment is also problematic. Many parents and handicapped students themselves have anxieties about this provision and its meaning, focusing on the counterproductivity that may occur if children are placed in situations for which they are ill suited.

The comprehensive system of personnel development is a complex undertaking that is most pertinent to people involved in training. The success of



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The success of the comprehensive system of personnel development will depend on a real commitment that college and university people, in particular, would be well advised to make.

We must become more broad-based and more realistically oriented.

this effort will depend on a real commitment that college and university people, in particular, would be well advised to make. Moreover, in light of the difficulties in decision-making authority experienced by many manpower planning committees, these state groups should be able to use VI-D funds or become part of state grant applications so that there may be means of organizing, disseminating information, and gathering the kinds of data that are needed. We need awareness and leadership on the question of teacher surpluses and on the perceptions that Congressmen and others have of this issue. When the National Education Association states that we are training to 200 percent of need, this information receives media and newspaper coverage, and it becomes more difficult for federal agencies to receive appropriations and for us to continue training.

Finally, the emphasis on inservice training is inescapable. When we consider how many different people and complex situations our teachers will have to deal with, it is obvious that a great deal of inservice education is also necessary for our own staff people and for trainers of teachers. It has been suggested that we trainers, as a group, have sometimes had a very narrow focus. The implication is that we must become more broad-based in our views and more realistically oriented.

The Division of Personnel Preparation is making an effort to establish a two-way forum with the field. I hope that we as professionals can match that effort with our own collaborative ideas, solutions, and support. In our various programs across the nation, there is much we can do to contribute to the total picture, to identify the greatest problems, and to assist with the most appropriate solutions.

REUBEN ALTMAN

Department of Special Education, University of Missouri, Columbia, Missouri



Leadership in certain states is not sufficient to implement comprehensive manpower planning or an encompassing system of personnel development.

THERE IS clearly an evolution of thought and an expressed ability to change within the Bureau of Education for the Handicapped, in terms of procedures, long-term planning, and current priorities. While this evolutionary process is well received, a pervasive concern remains as to the degree of discrepancy between priorities established and communicated to us by the Bureau and the reality needs that exist in our states. For example, the declining emphasis on general special education is not compatible with the needs of many rural states where general special education is still a very high priority. In fact, many people wish to see an increasing focus on the particular problems of rural training programs—in staffing, in recruiting students, and in delivering services to children.

Contradictions are also apparent in actualizing the comprehensive system of manpower planning and personnel development that is to be built into training grants. Within individual states represented at this meeting, the feeling conveyed is that leadership in certain states is not sufficient to implement comprehensive manpower planning or an encompassing system of personnel development. Even in cases where efforts are made and ongoing meetings take place, the necessary follow-through is not seen as forthcoming.

A third major question has to do with the Bureau's emphasis on evaluation, in the absence of funding that would make it possible to carry out the kinds of evaluation that are required. As designs and data collections become more and more sophisticated, they will require additional personnel and resources, and, while we know that we want this kind of quality control, there are real questions about how to pay for it.

Finally, we have concerns about grantsmanship. Just as the Division of Personnel Preparation is endeavoring here to meet our needs for factual information, its personnel should also communicate what might be called "psychological impact information." Suppose, for instance, that a training program is staffed largely with part-time personnel because these happen to be the available people with the greatest expertise. When this part-time faculty is described in a program assistance grant application, is it perceived by reviewers and project officers as a selection of the best possible people or as a patchwork program? Questions of this sort are subtle, but they are on people's minds and need to be dealt with.

Also related to grantsmanship is our distress over the short time interval between notification of funding and the date when continuation proposals are due. When a new program is just getting off the ground, it is not realistic nor feasible to supply the kinds of progress reports and data that will support its second-year application. In addition, there are requests for more specific information on the amounts of money available, or guidelines on what maximum amounts a program might request. Last, needs are expressed for more clarification of the various forms and documents that must be submitted to the Bureau, in addition to the explanations covered in the application packet.

While some of these questions may appear to be criticisms, the excellence of the intent of this meeting and the way it was conducted has been repeatedly expressed. Ideally, such meetings would be held earlier in the year so as to provide more lead time for proposal writing. However, an important need for annual ongoing communication is being met, and continuation of these meetings should be well supported by the training field at large.

The Division of Personnel Preparation should communicate what might be called "psychological impact information."

CYNTHIA GILLES

Director, Special Education Manpower Project
Massachusetts Department of Education, Boston, Massachusetts

FROM A state education agency perspective, this meeting has touched on a number of important points. States are receiving mixed messages and need more clarification of directives. For example, no specified range of acceptable parameters for a comprehensive system of personnel development has been established, and state education agencies need guidelines on those things that are absolutely required and on the options and alternatives that are available to allow for the uniqueness of individual states. The relationship between state VI-D proposals and the total comprehensive system of personnel development also remains unclear. Ideally, the comprehensive system should provide for a creative balancing of training resources (personnel, programs, materials, funds) from multiple sources to respond to identified state needs and priorities, as well as to needs that are regional or national in scope.



On some occasions, state education agencies are expected to exhibit the clout that will enforce Public Law 94-142, while, on other occasions, emphasis rests on the cooperative nature of planning and implementation.

Another area of concern is the variance between requirements of the federal law and regulations, as compared with state law and state regulations. We must also deal with the discrepancy between the cost of mandated programs and the additional funds that are actually available to support them. Moreover, when we talk about heavy funding for special education training of regular education personnel, we become involved in redefining existing roles and changing the positions of many educators. Finally, we are faced with a somewhat contradictory philosophical view of the comprehensive system of personnel development—that is, on some occasions state education agencies are expected to exhibit the clout that will enforce Public Law 94-142, while, on other occasions, emphasis rests on the cooperative nature of planning and implementation.

States have the responsibility of coordinating rapid and very extensive change processes that affect all of education. This job is complicated by competition between special education and regular education for funds, and by political battles between different agencies and organizations. The lack of specificity in defining populations to be trained further complicates matters. There are questions about who should be included under certain kinds of grants (e.g., regular education inservice), questions about what is excluded as well as included in terms of coverage under certain kinds of funding—and we look to the Bureau of Education for the Handicapped for assistance in these areas.

We need to provide options and different approaches to inservice training because, at a state level, we are dealing with so many different sorts of training institutions and delivery systems.

Inservice also requires greater definition. What is the range of models to be considered? What ultimate duration of inservice training can be offered to or required of people who are employed full time? We need to provide options and different approaches to inservice because, at a state level, we are dealing with so many different sorts of training institutions and delivery systems. In our state, we have gradually evolved a type of inservice training which is a blend of preservice and traditional inservice training. This “long-term” inservice program prepares currently employed personnel for new roles and credentials.

Today we can include in training everyone from parents to hearing officers to staffs of state education agencies and college faculties.

Another problem area is that of determining the total range of populations to be trained or retrained. This means mapping the total training system and planning for a much broader range of personnel than we were considering a few years ago. Today we can include everyone from parents to hearing officers to staffs of other state agencies and college faculties. Considerable variation exists across and within these groups in terms of levels and intensity of training needs. In addition, many special educators may have been trained for narrow roles that are now being broadened. Just to map a total system of needs for preservice and inservice training is a major problem for state education agencies and, of course, they are responsible for providing that information to colleges, universities, and the Bureau of Education for the Handicapped.

To develop a system of personnel development, we certainly must provide opportunities for a variety of professional representatives to participate in the planning process. Providing an opportunity, however, is not the same as actually involving the people. Various states are experiencing numerous problems in getting a cooperative planning system off the ground, even though they may be doing all the right things. Institutions of higher education are being asked to respond to substantial unmet needs for new personnel and to steadily increasing demands to deliver inservice training. They must be provided with accurate information on manpower and training needs in order to make the most efficient allocation of their limited resources. Getting accurate information

on the manpower/needs balance can be quite difficult, particularly when this information must be gathered on a regional or national level, and here again Bureau assistance is needed.

In terms of immediate needs, state people want more opportunities to share their problems and their problem-solving strategies, their innovative programs and their established and well designed programs. They want to find out what is going on across state lines, and they want technical assistance. State people also want creative strategies that will help them to coordinate their efforts with those of other public agencies. Although it may appear fairly straightforward in regulations, it is no easy matter for a state department to begin supervising a department of mental health. This interagency concern ties in with the need for more collaboration to produce interdisciplinary training at a school district level, between departments and institutions and between public and private resources. We need new models for interagency collaboration and interdisciplinary training, as well as methods for redesigning existing training programs.

Public schools and other public and private agencies also have concerns that are being discovered by university and state personnel. First of all, public school people want some options in developing inservice programs. They do not want a standard package delivered on a statewide basis without variation; they feel that they, too, have needs for individualization. Second, some public school systems would prefer to design training programs using resources other than the university. The message here is that colleges and universities are becoming the sellers in a buyer's market, and the buyers are increasing in the public schools.

A very positive step is the fact that the Division of Personnel Preparation and the Division of Assistance to States will be working more and more closely together in the future. That is highly desirable and, coupled with the maximum collaboration and communication from all trainers in the field, can perhaps lead to the kinds of clarification, definition, and substantive assistance that state departments of education need to resolve these difficulties and conflicting demands.

State people want more opportunities to share their problems and their problem-solving strategies, their innovative programs and their established and well designed programs.

Public school people want some options in developing inservice programs.

EDWARD J. KELLY

Chairman, Department of Special Education
University of Nevada, Las Vegas, Nevada

PUBLIC LAW 94-142 is broadly viewed as a money bill or a civil rights act, depending on one's frame of reference. While we university people tend to view this law as a civil rights act, we have not yet addressed the specifics of our own commitments to the implementation of this law.

We will, for example, pursue much more P.L. 94-142 related inservice activities with local school districts. At the same time, we may also find ourselves in adversary roles relevant to P. L. 94-142 with these very districts. How shall we easily pursue these diverse roles? Our grant applications often stress the leadership roles we effect in our service regions. How shall our leadership be perceived if the same local districts we purport to lead should fail to comply with Public Law 94-142?

*If we are not in the future
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offered?*

In addition to this question, the western states have always had specific concerns that stem from their uniqueness. With the exception of states like Texas and California, most of us represent large geographic regions which contain scattered university programs. Most of these programs have functioned quite literally as the "only game in town" for perhaps 250 miles in any direction. To date we have always been funded as total programs, not as a collection of discrete preservice and inservice activities. If we are not in the future to be funded as total programs, then who will provide the services that we traditionally have offered?

*What about full-service
programs that carry on
inservice without federal
funding?*

This question is extremely critical in view of the growing emphasis on inservice training, because many of our preservice programs have developed from inservice programs. Many of us began single-person programs in specific areas, evolving new programs in response to local interest shown in new program ideas exposed in special inservice workshops, etc. We have had, for this reason, a commonly heavier reliance upon inservice activities than many eastern schools. As the Division of Personnel Preparation moves into heavy support of inservice training, therefore, we must ask, "what are you going to do about already established western state full-service programs that have always counted on their inservice programs without federal funding?". We do this in Nevada, conducting 15 to 20 workshops and special conferences each year, which have never been federally funded and which have been at minimal cost and maximal impact. From our perspective, therefore, the dollar amounts requested for new inservice proposals should be viewed very critically because what we now do for \$3,000 may be priced at \$30,000 by another program. Obviously this is one question that should be resolved when the various review panels are convened.

The western states are also unique in that they have developed programs very slowly and, in many cases, have dealt with unusual program variables in remote regions. While we now feel that BEH staff better appreciate the scope of our western training problems, we still feel that one never really comprehends the immensity of the region we serve, nor the unusual problems we face in providing service to it, until one gets the feel of the region (or better yet, attempts to drive around its parameters). To reiterate a crucial point, western programs are more likely to be full-service programs, not just clusters of neatly divided discrete inservice and preservice activities. Proper proposal evaluation must therefore take into account such critical regional differences and needs.

We also need to examine the mix between inservice and preservice components. They should not be combined in a comprehensive program assistance grant application, for these activities are simply not the same. Perhaps a new set of application guidelines specific to inservice activities is now in order.

*It is not possible to be
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commitment to the
profession and the
children we serve.*

Finally, we attended this meeting largely because we want to discover new wrinkles germane to proposal writing. We all now know that the day of "grantsmanship" in special education is dead. It is not possible to be awarded funds for a slick proposal written by a person without expertise in special education and without a sense of commitment to the profession and the children we serve. Nor is it true that field readers spend a minimal time reviewing each proposal. Having been a panel member and reader, I know the many hours that are spent in this process. These are refereed grants, similar to articles submitted to scholarly journals with their own professional review boards. What we all seek is more information on different ways of structuring

proposals, of unifying them with a coherent philosophy and set of operational rationales for each program subcomponent. Most critically we need to know more about program evaluation. Obviously there is no one correct way to evaluate programs. As proposal writers we need to know a variety of alternative models which enable us not only to collect and report our data, but also to use such data to improve our programs from year to year.

While we look to the Bureau for some of these answers, we must also look to ourselves—to our sense of commitment to making both our programs and our profession more effective.

JASPER HARRIS

Department of Special Education, University of Kansas, Lawrence, Kansas

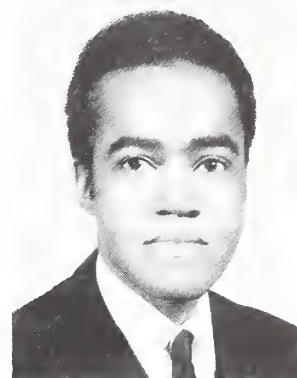
THE PEOPLE at the Division of Personnel Preparation do not have all the answers, although they do understand many of the questions. I believe that the Division is making a sincere and imploring effort to ask us in the field to help with the refinement of the regulations for the Education of All Handicapped Children Act. In responding, we also pose a series of questions.

A central question involves how dollar amounts are attached to priorities. Because different regions have different concerns, setting aside universal amounts for specific priorities has been a matter of concern for many people. In the past, universities and other training agencies have responded to Bureau priorities, but, now that the focus is shifting from mild to severe handicaps, what is to be done about maintaining the former staff and hiring new staff members?

Another question involves comprehensive programs. Considering the present priorities and the fact that many bloc grants across the country are scheduled for reduction by half, one wonders whether the Bureau is no longer interested in comprehensive programming.

Finally, some questions are pertinent to the process of grant application and award. People ask whether the approval of a convened panel in the review process leads in all cases to Bureau approval of the application. There is also an expressed need for more standardization and harmony between grant guidelines and grant evaluation sheets, as it is difficult to address evaluation components and meet grant guidelines simultaneously.

These concerns, as voiced here by participants in this meeting, are legitimate issues that we will face in our own environments for months or years. Many of us feel that the adjustments that need to be made in the regulations for Public Law 94-142 are substantive in nature and explanatory. Our desire is both clarity of language and a definitive posture.



Now that the focus is shifting from mild to severe handicaps, what is to be done about maintaining the former staff and hiring new staff members?

GEORGE M. OLSHIN

Southern Connecticut State College, New Haven, Connecticut



We must participate fully at the college level in the development and review of manpower planning.

As the supply of funds grows smaller, the quality of programs we propose will no doubt increase.

THE FOCUS of personnel preparation is clearly on the practical, rather than on the theoretical or Ivy League traditional. The people at the Division of Personnel Preparation have always emphasized the need for hands-on experience among faculty members, and the importance of practice for trainees. But now our need to get things done in terms of P.L. 94-142 makes practical realities all the more important.

A number of things will require patience because they will not happen overnight. There is concern that a definition of social maladjustment is not included in the regulations. We should recall that it took the American Association on Mental Deficiency 20 years to develop their definition, and there is still disagreement on it.

We were also reminded that we must participate fully, at the college level, in the development and review of manpower planning, and that will be a long-term process, as will our response to Sections 502, 503, and 504 of the Rehabilitation Act. At our college, we were a little embarrassed because, after having been in the special education area for over 15 years, we finally last year got the curbs cut and some ramps installed. It simply took all that time for our administration and for the state to get the money to get the job done, and, even then, it was in response to a pressure group of students and faculty members.

We also need to deal with the cutbacks in some federal funding, and have to re-examine our allocations for training and for stipend payments. The five different programs of student support mentioned earlier have considerable money, and we should at least explore them, rather than writing stipends arbitrarily into proposals. We should look into them, too, in order to attract the right students.

As the supply of funds decreases, the quality of programs we propose will no doubt increase. When 1400 applications are received and 700 are awarded funds, it is clear that there is much competition for grants. The recipients, in the final analysis, will be those who have been able to mesh Public Law 94-142 into their programs and to develop ways to carry out thrust-relevant activities. To help us in these areas, the Bureau has done some highly creative things in terms of the Missouri manpower planning project, the New Mexico dissemination project, and the Virginia evaluation project, as well as other projects that can help us. Becoming involved in these activities and services will enhance our abilities to plan and execute our own programs, and thereby to serve handicapped students and other professionals with increasing effectiveness.

JERRIE UEBERLE

Arizona Department of Education, Division of Special Education, Phoenix, Arizona

THIS CONFERENCE was my inservice. There has been great value for me in receiving this information, hearing these ideas, talking with fellow professionals, and being able to attach faces to names. There has been a good clarification of the changes that are necessary in light of Public Law 94-142 and the changes that have occurred within the Division of Personnel Preparation. Moreover, the honesty and integrity with which questions were answered has been remarkable. I congratulate the Division of Personnel Preparation for its support to us in the field as we move toward developing a comprehensive system of personnel preparation.

A number of points could be made as a result of this meeting, but the one I want to express concerns the use of VI-D funds. We have heard repeatedly that these monies are discretionary and highly competitive. Therefore, if we are awarded VI-D funds, they are in reality the frosting on the cake—special funds to do special things. In order to decide about the frosting, we must first know about the cake. Educational inservice dollars are already available and are being spent in every state. Is what's happening the best we can do? Is this what we need to continue? Do these programs represent answers to our present needs? Or do they represent what we have done year after year? Perhaps new money—additional money—is not what will make the difference. Perhaps we must first look at our present use of existing funds to determine what the "cake" is before considering the need for frosting. The VI-D funds are intended for the development of exemplary programs that will help to implement Public Law 94-142. That should be the intent of everything we do. All programs must address that as their target concern. Programs that do not address exemplary practices that assist in the implementation of delivering services to all handicapped children should not be continued. Our basic programs, the existing systems, should be reacting to the changes in legislation and the new needs in the field. The response should be awareness of what we are doing—and what we need to enhance with additional funds.

If our existing training efforts are not making a difference, we must identify and do those things that will, not with new monies, but with existing monies. We cannot be dependent on VI-D discretionary funds to remediate shortcomings in our basic systems. We must restructure our basic system and create a cake worth frosting, rather than lots of frosting and no cake.



The VI-D funds are intended for the development of exemplary programs that will help to implement Public Law 94-142, but that should also be the target of everything else we do.

Perhaps we must first look at our present use of existing funds to determine what the "cake" is before considering the need for frosting.

DIANE D. BRICKER

Mailman Center for Child Development, University of Miami, Florida



*We must work together,
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*One substantial area we
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AS A means for communication between the Bureau of Education for the Handicapped and the people in the field who are doing what needs to be done, this kind of dialogue should be continued and enhanced. In fact, it behooves all of us to find methods of meeting among ourselves more often and to open up lines of communication. We are trying to tackle enormous and complex problems, and any mechanism that will increase understanding about what is going on in the field and in Washington should lead us to better resolutions of the real and serious issues we are confronting.

This meeting has provided practical assistance in completing grant applications and understanding time lines, and has thus saved time for us in the field and for the Bureau. On a less pragmatic level, this meeting has helped to focus on some major issues, and has illuminated some of the work that will bring solutions to these issues. One message BEH seems to be sending is that we must work together, find ways to look at the pie, divide it, and carry out activities in a more efficacious manner. For a long time, we were accustomed to having sufficient funds to develop and implement projects independent of each other. What we now face is a different and very tough reality. Limited funds are requiring the development of strategies for coordinating and cooperating. Meetings like this could be a springboard or an augmentation of these efforts, particularly if their content were expanded. On the one hand, it is necessary to understand procedures and policies that pertain to grant applications. On the other hand, it is even more important to have mutual understandings about the *content* of applications and the *content* of the field.

One substantial area we should explore is the best use of finite resources. The truth is that there is not enough money to do all that needs to be done. I work with young children who are severely handicapped. The cost of providing appropriate service programs for this population is staggering, and yet we should be finding strategies to generate and support early intervention programs for all handicapped children. One potential solution is to pool our resources at a local, state, and regional level, and then determine how to most effectively use those resources we have.

Difficulties also exist in terms of evaluation procedures, which are easier to develop than to implement. Although we know many of the variables that apparently make a difference in our programs, to our trainees, and for children, we lack good instruments for measuring the effect of variables objectively. In many instances, we are not looking for short-term, but for long-term, outcomes. We need to follow our trainees for three years after graduation, not just three months, but often we do not have the resources to do the necessary kind of tracking and much other important data gathering.

The growing relationships among institutions of higher education, state education agencies, and local education agencies, and those between state and local education agencies, compose another key area of concern. A productive relationship is considerably more than obtaining a letter of support from the state department. Real communication and sharing require work, and the willingness to compromise. We all need strategies for developing these relationships and maintaining them productively.

The regulations for Section 504 of the Rehabilitation Act and for Public Law 94-142 have given us new standards, and people tend to interpret some of these regulations and standards from a relatively unbending perspective. A better point of view might be caution as to how we rattle the public's cage. We who work with exceptional individuals often forget that we are a minority group working with yet another minority group. Although rapid changes may be possible on a superficial level, it is altogether different to change attitudes. Perhaps we should think in terms of successive approximations, rather than ultimatums. Pushing and forcing may not always achieve what we want to accomplish in the long run. Patience, careful planning, and cooperation may be our best means for assisting the handicapped individual in obtaining his lawful rights.

We who work with exceptional individuals often forget that we are a minority group working with yet another minority group.

LAWRENCE W. MARRS

Chairman, Department of Special Education,
Murray State University, Murray, Kentucky

INTERFACE, INTERACTION, and infusion are three words that might characterize the essence of this meeting. There is change in the Bureau of Education for the Handicapped, which is beginning to function as a change agent in the field of special education in relation to institutions of higher education, state education agencies, and local school districts. The people at this conference are ready to participate in this change.

The possibility of relating to the field through interactions among colleges, universities, state departments, and local school districts seems to be the future direction of personnel development in special education. Although we have had this option for creative development for some time, we have only recently seen emphasis on this approach. The fact that the laws and regulations are pointing to this forces us to make these needed changes in the educational enterprise. Thus, there is a need for systemic change and for change agents to lead the whole effort, and there is a potential for each of us to act as change agents. If we can see Public Law 94-142 and other mandates as resources and can communicate them to others as resources, we will have done a great service.

The Division of Personnel Preparation is now developing a proactive stance, not just a reactive strategy. This is reflected in its organizational changes and its willingness to participate with programs in the field. One analysis of the success of this conference has been the idea that it could be a large, open-ended discussion, providing long-term leadership for systemic change. The people here are interested and excited about this kind of change, and look to the Bureau of Education for the Handicapped to provide continued leadership.



If we can see Public Law 94-142 and other mandates as resources and can communicate them to others as resources, we will have done a great service.



CONCLUSION: PARTNERSHIP FOR CHANGE

JASPER HARVEY

Director

HERMAN SAETTLER

PAUL ACKERMAN

Branch Chiefs

Division of Personnel Preparation
Bureau of Education for the Handicapped

A FEDERAL agency should serve its constituents. The Division of Personnel Preparation exists to serve all agencies that train personnel in the vital and humane process of educating children with handicaps. Given all the variables, limited federal funds, overburdened and understaffed training agencies, and necessary paperwork, how can this Division help you? Expressed as a philosophy, how can we become partners?

The Division of Personnel Preparation exists to serve all agencies that train personnel in the vital and humane process of educating children with handicaps.

1. Participate in establishing priorities. The matter of priorities is one area in which federal concerns sometimes appear to differ from your concerns. Federal funding priorities are based on significant needs for training, determined by Public Law 94-142 and on needs that arise in the field. These priorities are identified in a manner that is quite painstaking. Note the following sources of information for determining priorities, and ask yourself how your voice may be heard through them:

- The Congressional hearing;
- The Congressional intent as expressed in the conference report accompanying the legislative packet;
- The *Congressional Record* of both the Senate and the House;
- Joint conference reports on legislation and appropriations;
- State plans;
- State legislation;
- Institutions of higher education application data;
- Professional organizations;
- General Accounting Office studies and audits;
- National Center of Educational Statistics studies;
- National Education Association studies;
- Professional judgment of the BEH staff;
- U. S. Office of Education general counsel interpretations of the law and the intent of Congress;
- Budget review testimony of the Office of Education, Assistant Secretary, and Office of Management and Budget levels. . . .^{47,48}

The direction of dollars may continually shift in order to provide for various needs for personnel that are surfacing in critical categories, but our major

responsibility is to the training of personnel who will educate Public Law 94-142's first priorities—the unserved and the most severely handicapped. Some areas of the country are experiencing massive difficulties in terms of training and retraining to comply with the law. Thus, when proposals are received from such high-need locations, our overriding concern will be the extent to which they show promise of responding to the greatest training demands in their service areas.

Different sections of the country manifest great dissimilarity in the way training has evolved, in the extent to which preservice trainers have related to inservice needs, in the availability and use of resources, and in the current status of programs.

Some of you, however, will find that federal priorities do not coincide neatly with the priorities that directly influence you—priorities of geography, state plans, or training institutions. Different sections of the country manifest great dissimilarity in the ways training has evolved, in the extent to which preservice trainers have related to inservice needs, in the availability and use of resources, and in the current status of programs. Hopefully, the new regional emphasis within the Division will assist in reconciling regional priorities with mandated national requirements. Even though state manpower planning committees are charged with assisting in the solution of statewide personnel development needs, more planning and action will have to be undertaken—by you—to provide the common answer to three major questions posed in chapter 8. You will have to find more general special education dollars to prepare personnel to serve the mildly handicapped. You must determine how you can retain long-time staff members while, at the same time, employing new personnel to implement new priority areas. You should question and remedy the problems related to the relative strengths and weaknesses of training programs staffed with part-time faculties.

A strong general special education base is vital to the substance and growth of training programs, and many training agencies have already provided for this in an enduring manner.

2. Recruit a competent academic/clinical faculty. The answer to all of these questions rests on the necessity of developing a critical mass of full-time personnel whose salaries are paid by university monies, rather than by temporary federal funds. For a number of years, the Bureau of Education for the Handicapped spent large amounts of money to underwrite training programs in general special education. Training institutions have had considerable lead time to transfer this core of general special education personnel to university money, and to use federal grants for the development of new programs. In no sense is the importance of a strong general special education base to be minimized. Such a core is vital to the substance and growth of training programs, and many training agencies have already provided for this in an enduring manner. For them, it is not at all impossible to provide adequate training for teachers of the mildly and moderately handicapped and, at the same time, rely on Part D monies to meet priorities established by Public Law 94-142.

The same planning must apply to the question of staffing of programs with part-time personnel. To ensure quality, a program must have a core of full-time faculty and staff; without full-time people, no program can achieve enrichment or expansion, no matter how highly qualified its part-time personnel might be. There must be commitment to student selection and advisement, research, leadership, supervision of internships and practica, as well as collaboration with public schools, communities, and state agencies. The fragmentation of part-time staffing does not facilitate the achievement of these necessary goals, although part-time faculty members can contribute significantly within the established matrix and dependable continuity of the core staff.

Planning should also help training institutions to combine both inservice and preservice programming into a single proposal. If the two are separated,

reasonable teaching loads become more difficult to establish and an atmosphere of part-time effort can easily prevail. In supplying manpower to serve all handicapped children, inservice and preservice training, as well as a full-capacity faculty, should be parallel commitments.

3. Achieve full collaboration among state and local education agencies and institutions of higher education. The state education agency oversees all state educational services and is faced with a variety of people who need training, as well as numerous requirements for service delivery. These demands are forcing the state education agency to change its entire role structure and, subsequently, to experience the duality of parity and power. On the one hand, the state plan for comprehensive personnel development should involve the state department in collaboration with all people concerned with preparation. On the other hand, because the state has ultimate responsibility, it will have to exercise its power to set comprehensive plans in motion.

The new kinds of relationships now required between state education agency people and providers of training are, in many senses, fragile. While there are many opportunities for a large group of professionals to become engaged in planning for personnel development, successful collaboration will depend in large measure on the personal commitment of those who become involved. There is an absolute need for trust among all of those now involved in training; competitive interactions or "stonewalling" must be eliminated. People must reach certain levels of understanding—and then productivity.

4. Plan for inservice training. Regular educators must be trained to teach exceptional children in their classrooms. The existing special education teaching force must be upgraded and updated, and a large number of support personnel must be trained. Inservice programming must take on an unbelievably broad scope in order that all children may receive the most appropriate education in the least restrictive environment. That least restrictive environment for each child grows out of his individualized educational program, and all personnel related to that child and to that program must understand that the processes required by Public Law 94-142 are part of a continuum whose bottom line is a free, appropriate public education for that child and for all others.

Now that your part of our partnership is defined, it is time to clarify the role of the Division of Personnel Preparation, a role best described as that of facilitator. How do we work, and what are our responsibilities?

Many people want to know about the Division's internal work schedule. Technical and professional evaluation and processing of 1400 proposals starts in October and extends until June, and the pressure to complete the entire process within that time frame is great. We also begin in December of the previous year to prepare application forms, obtain package approval, determine and clear closing dates, and attend to many other details pertinent to applications. Our schedule does not dovetail with the demands made on training programs, but Tables 14 and 15 show the pace of our activities for the current year and just how compressed they are.

Curiosity about individual award amounts is also evident. Our average grant is \$60,000, and the range is generally between \$10,000 and \$340,000. It is impossible to advise applicants as to the amounts for which they should apply; program developers are the single best judges of program costs. On the other

The state education agency is being forced to change its entire role structure and, subsequently, to experience the duality of parity and power.

Inservice programming must take on an unbelievably broad scope in order that all children may receive an appropriate education in the least restrictive environment.

hand, all applications cannot be funded at the levels they request because financial resources are severely limited.

Outright approvals of applications, without any concerns, are a rarity.

In the review and approval process, panels, project officers, and the Division Director read proposals and make recommendations about approval, disapproval, modifications, and so on. The Deputy Commissioner signs off on these recommendations, as his own final decision to the Grant and Procurement Management Division, which processes the award. Although changes in recommendation may occur at each level, substantial and specific documentation and reconciliation must accompany every change. Outright approvals of applications, without any concerns, are a rarity but, even when this occurs, funding level considerations enter the picture.

Simply addressing needs is not enough; plans must also be made to show whether needs are being met, as documented in measurable, positive changes in trainees, children, service delivery.

Applications have to contain adequate justification of the *need* for training and the *need* for funds, and must describe procedures for evaluating program effectiveness. An application that only addresses needs is not sufficient; plans must also be made to show whether needs are being *met*, and whether the applicant is documenting positive changes in trainees, children, and/or service delivery.

Your questions regarding evaluation reflect mutual anxieties about ensuring that programs work. Evaluation costs money. Thus, five to ten percent of each grant budget should be allocated to this component. The problem, however, is more than an issue of money and personnel allocation. It is compounded by the current lack of instrumentation for gathering data on personnel preparation. Missing are proven means for long-term evaluation and follow-up of trainees. This kind of tracking is important, not only for evaluation and modification of training, but also for determining the extent of and reasons for our attrition rates. A central issue is "burn-out," particularly in personnel working with severely handicapped children. We need to understand what happens to these people who have been so painstakingly trained, and then arrange career continuation to renew them and keep them in the profession.

We are absolutely concerned that Public Law 94-142 is implemented, and we ask that trainers make the extra effort that will be necessary to see that this is accomplished.

The Division of Personnel Preparation is very serious about finding solutions and creating programs that will guarantee the rights of the handicapped as defined in Section 504 of the Rehabilitation Act and in Public Law 94-142. We also realize that total compliance with the spirit of the law will not happen overnight. It will take many people acting in good faith and expending extraordinary effort. It will also require the leadership that will develop as professionals are required to stretch, to be creative, and to use all of their capacities.

The potential for change resides in all individuals, and change can be renewal. Although the requirements of Public Law 94-142 may, in some quarters, represent an onus, they can also be seen as a challenging set of possibilities. There is care throughout the nation about doing the right things for children. We want to help with this, and we want to do so with a sense of partnership with the people who are really carrying out these changes—you. If you cannot see us as a part of you and yourselves as a part of us, we will not be able to accomplish what we are setting out to do.

⁴⁹Saettler, H. Setting priorities for the preparation of personnel. In Roy Littlejohn Associates (Ed.). *Conference summary of Public Law 94-142: Division of Personnel Preparation/Division of Media Services*. Washington, D. C.: U. S. Office of Education, Bureau of Education for the Handicapped, 1976, p. 99. (Distributed by the Division of Personnel Preparation, Bureau of Education for the Handicapped)

⁵⁰Burke, P. J., & Saettler, H. The Division of Personnel Preparation: A discussion of how funding priorities are established and a personal assessment of the impact of Public Law 94-142. *Education and Training of the Mentally Retarded*, 11(4), December, 1976.

TABLE 14
Schedule for Processing New Grant Applications, FY 78-79
Division of Personnel Preparation

Activity	Deadline
Closing date published	July 21, 1978
Application mailing list established and validated	July 21
Mailing list completed by Grant and Procurement Management Division (ongoing activity)	July 28
Evaluation procedures from previous year reviewed	July 28
Applications distributed and mailed by Grant and Procurement Management Division	August 12
Technical review plan prepared	August 15
Qualified field readers identified	August 15
Closing date	October 24
Applications distributed and mailed by the Division of Personnel Preparation (continuous until deadline)	October 24
Applications received by Application Control Center	October 24
Program log established by Application Control Center	October 27
Applications received by Division of Personnel Preparation from Application Control Center	October 27
Applications and Program control log delivered to program by Application Control Center	November 3
Applications screened and budget allocated by Division of Personnel Preparation	November 3
Preliminary review by project officers	November 9
Proposals assigned	November 17
Field readers and convened panels established	November 17
Review packages mailed	November 30
List of qualified reviewers established (includes committed field and convened panelists)	December 10
List transmitted to Grant and Procurement Management Division	December 10
Panels convened (panelists hand carry review packages to panels)	February 2, 1979
Project officers' evaluations (begin February 5)	February 23
Reconciliation and funding reconciliation	February 23
Branch review, recommendations, and reconciliation (begin February 26)	March 9
Division review, recommendations, and reconciliation	March 16
Awards list prepared for responsible official	March 19
Prefunding review	March 26
Further reconciliations/Branch and Division as directed	March 30
Awards list forwarded to Grant and Procurement Management Division	March 30
Official files assembled and forwarded to Grant and Procurement Management Division	April 20
B-4 listing corrected by Division of Personnel Preparation (continuous until deadline)	June 30

TABLE 15
Schedule for Processing Continuation Grant Applications, FY 78-79
Division of Personnel Preparation

Activity	Deadline
Closing date published	July 21, 1978
Application mailing list established and validated	July 21
Mailing list completed by Grant and Procurement Management Division (ongoing activity)	July 28
Evaluation procedures from previous year reviewed	July 28
Applications distributed and mailed by Grant and Procurement Management Division	August 12
Technical review plan prepared	August 15
Qualified field readers identified (rarely needed for continuation applications)	August 15
Closing date	October 10
Applications distributed and mailed by Division of Personnel Preparation (continuous until deadline)	October 10
Budget allocated	October 10
Applications received by Application Control Center	October 10
Program log established by Application Control Center	October 13
Applications and program control log delivered to program by Application Control Center	October 13
Applications received by Division of Personnel Preparation from Application Control Center	October 13
Applications screened by Division of Personnel Preparation	October 18
Progress reviewed by project officer	November 9
Branch review, recommendations, and reconciliation (begin November 13)	November 24
Division review, recommendations, and reconciliation (begin November 27)	December 1
Awards list	December 8
Official files sent to Grant and Procurement Management Division	January 12, 1979



ROBERT B. HERMAN

Associate Deputy Commissioner
Bureau of Education for the Handicapped
U.S. Office of Education

A SOCIETY'S CONCERN for its problems and its means for achieving its broad goals fluctuate in response to both political and practical forces. But the problems remain and continue to surface until they are solved. When certain of these problems become elevated to national prominence, they become easier to solve because political and practical resources will be amassed in their service. When an area of concern is not transposed into society's goals, those who have the problems, those who feel the problems, and those with the insight and compassion to work on the problems very often proceed with difficulty, sometimes in isolation, and frequently with inadequate resources. Concern for handicapped individuals and their education has been subject to these fluctuations.

In the early 1970's, the federal government was changing its position on the support of training in various professions and was raising questions about who should be trained, who should do the training, and for what purposes. As we witnessed a decline in federal support for medical and health-related training programs, we experienced growing concern about the future of personnel preparation in special education, concern about providing the kinds and numbers of personnel needed to properly educate handicapped children. We wanted to engage the interest and support of Congress, and we also felt the urgent need to forestall any movements by those who felt that the federal government should not be involved in the support of teacher training.

Fortunately, that potential crisis has passed, and not only has the special education personnel preparation program survived, it is also growing. For the 1979 fiscal year, we expect more than \$55 million to be allocated and spent on training teachers and other personnel to work with handicapped children. The

credit for this goes basically to you—the trainers of personnel in universities and other institutions of higher education, in state and local education agencies—to the cooperation, hard work, leadership, insight, and compassion you have exhibited. The Bureau of Education for the Handicapped owes you its gratitude, as I think the nation does, because you upheld the principle of providing well trained personnel to serve handicapped children, regardless of fluctuations in political and practical fortunes.

Currently, we are all involved in ensuring the successful implementation of Public Law 94-142. Those of us at BEH have spent a good deal of time this year working with the states on assurances of compliance, on identifying and solving problems, and in dealing with issues that arise. The most pressing of these issues centers on due process hearings, including the diagnosis, evaluation, and placement of individual children. We are trying to do all we can to help local education agencies and teachers to understand the concept of the individualized educational program—what it means, how it can reach the highest level of quality, and how best to carry it out in regular and special classrooms. You in personnel preparation are also bearing responsibility for assisting teachers in implementing the law on both preservice and inservice levels, and you are contributing immeasurably to their understanding of the potency of the IEP as a vehicle for the education of handicapped children in today's society. We hope that you will continue to help us carry out that responsibility.

Through ongoing determinations of critical needs, and through communications with you, we have established a number of priorities and criteria for the distribution of personnel preparation and Part D funds, all of which have been expressed throughout these proceedings. While working to meet these

priorities, we also need to look at the broad societal impact that our collective endeavor can and should have. In this regard, our vision should expand beyond the immediate education of the handicapped child and the support of his movement into the least restrictive classroom environment. Our fundamental understanding should be that the individualized educational program, the due process procedures that surround it and all of the other features of Public Law 94-142 are in fact far greater than the sum of their parts. They can help many handicapped children not only to prosper in the regular classroom, but also to move into a normal position in society as adults. In all of our work, we should preserve this vision of children becoming adults with the capacity to earn a living, contribute to society, and achieve sensitive and reasoned self-actualization. These have been the traditional goals of American education, and special education must never lose sight of them.

To make these goals paramount to special education, I think we may in some cases have to create a supply in order to bring about a demand. Vocational and career education have generally been unresponsive and unreceptive to the needs of the handicapped student and, for that matter, of the disadvantaged student. Yet we know that 90 percent of handicapped individuals can work productively at jobs, and some can do professional work. None of this will happen, though, unless and until there are teachers who can prepare them. The demand for vocational and career education for the handicapped population will arise only if we take initial steps by insisting on an ample supply of personnel to provide the appropriate educational experiences for students.

At the opposite end of the spectrum, we are much concerned once again about the education of the infant and preschool child. Early childhood implementation programs are not taking hold as fast as they might. Not enough states are providing education to the three-to-five-year-old group; states that do not offer education to all children in this age group do not have to offer it to handicapped preschoolers. But I think it is our responsibility as professionals, as teachers, trainers, and citizens, to demand and provide personnel who can produce effective intervention at the earliest possible time in the lives of handicapped children.

Our vision should also expand to include those groups of children in our society who are still neglected, if not forgotten, and who are certainly not being served with the kind of attention they deserve as

American citizens. Among these are the urban minority populations, the bilingual and Black children who have been passed over and misunderstood in regard to special education opportunities. Public Law 94-142 applies to these children, too. Particularly for them, its many facets and provisions can be used to turn a debilitating and depressing situation into an avenue for growth that can eventually yield great benefits to society. The other focus of great federal concern is the Indian child, who is generally poor, who often lives under the most oppressive of conditions, and who receives very little in terms of special education.

We are asking you to include this vision of the infant, the young child, the forgotten child, and the adult in your imaginations, your energies, and your wisdom. We are asking you to use your creativity and efforts to develop the climate and the cadre of people who will bring services to all children, wherever they are and in whatever kind of economic, social, or cultural situation they find themselves.

We must ask other things of you, as well, if special education is to reach its potential for positive social change. Most essential is the dynamic endorsement of Section 504 of the Rehabilitation Act of 1973. Grant recipients must pay attention to the requirements of that particular piece of legislation, must employ handicapped individuals wherever possible, and must carry out affirmative action programs in behalf of the rights of handicapped children and the employment of handicapped adults. In working with handicapped professionals and in inviting handicapped persons to advise us on our programming, we must demonstrate that, as educators and managers, we also have a social conscience and a social responsibility. This is a human issue, but it is also an important legal issue. We in special education are the last people who can condone a separatist or discriminatory attitude, nor can we think of these efforts as charitable. This has to be a real-life partnership for all members of our society. We are in a position to lead in the realization of what Section 504 implies. It is not enough to educate handicapped children for productive adulthood; we must also include handicapped adults in our collegial ranks.

The funds for accomplishing these and other goals of personnel preparation continue to be available only because you who are involved in training have been responsive to the priorities and needs of the society in which we are living. You have given the Administration and the Congress confidence in putting extremely scarce resources to work for the

development of human resources, and you have captured their imagination and support.

The people in the Division of Personnel Preparation, their Branch Chiefs, and their colleagues throughout BEH are giving their best efforts to your needs, to the needs of children, and to society's needs in general. Jasper Harvey has done an enormous service in maintaining and advancing the priorities that have been developed over the years. He and the professionals within his Division are seeing that these priorities are met, while continuously working with the field to mesh priorities with other agendas that are also important. Modifications should be made from time to time, and we need to continue hearing from teacher trainers, practition-

ers, and other leadership personnel across the country concerning priorities and suggestions for their modification. We want you to test us on our commitment to work with you for the ultimate benefit of handicapped individuals. We want you to measure us by our commitment, and we want you to let us know when you believe we are doing the wrong things, as well as the right things. That is the only way an organization like ours can keep its advocacy spirit, and it is the only way an organization like ours can serve the public and respond to its needs. Above all, it is the only way that we can create the relationship that can liberate us all to bring about the changes in society that represent, when all is said and done, our real mission and our real reason for being a profession.

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